

1

2

3

4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

8

9

10

11 DEPOSITION OF: JEREMY LIGGETT

12

13

14

15 Tuesday, May 17, 2022

16

17 Washington, D.C.

18

19

20 The deposition in the above matter was held via Webex, commencing at 10:02  
21 a.m.

1

2        Appearances:

3

4

5        For the SELECT COMMITTEE TO INVESTIGATE

6        THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8        [REDACTED] SENIOR ADMINISTRATIVE ASSISTANT

9        [REDACTED], CHIEF CLERK

10      [REDACTED], INVESTIGATIVE COUNSEL

11      [REDACTED] INVESTIGATIVE COUNSEL

12      [REDACTED] INVESTIGATIVE COUNSEL

1

2 [REDACTED] Good morning. This is a deposition of Jeremy Liggett conducted by  
3 the House Select Committee to Investigate the January 6th Attack on the United States  
4 Capitol pursuant to House Resolution 503.

5 Mr. Liggett, please state your full name and spell your last name for the record.

6 The Witness. Jeremy Liggett, and that's L-i-g-g-e-t-t.

7 [REDACTED] Thank you very much.

8 Sir, would you please raise your right hand to be sworn by the court reporter.

9 The Reporter. Do you solemnly declare and affirm under the penalty of perjury  
10 that the testimony you are about to give will be the truth, the whole truth, and nothing  
11 but the truth?

12 The Witness. Yes.

13 [REDACTED] Thank you very much, Mr. Liggett.

14 So this will be a staff-led deposition, and at the time there are no members on the  
15 Webex, but they may also choose to join and ask questions.

16 My name is [REDACTED] investigative counsel. And on the Webex with me  
17 today are [REDACTED], investigative counsel; and [REDACTED], investigative  
18 counsel.

19 So we will follow the House deposition rules that we provided to you previously.  
20 And under the House deposition rules, you are permitted to have an attorney present,  
21 but I will note for the record that you do not have an attorney present.

22 Under the House deposition rules, neither committee members nor staff may  
23 discuss the substance of testimony you provide today unless the committee approves  
24 release. You will have an opportunity to review the transcript, and you and I can discuss  
25 the process for that afterwards.

1           Before we begin, though, I'd like to describe a few ground rules. There is an  
2        official reporter transcribing the record of this deposition. The reporter is also joining us  
3        by Webex, so please just wait until each question is completed before you begin your  
4        response, and we will try to wait until your response is complete before we ask our next  
5        question. It's just very difficult for the court reporter to write down what we're saying,  
6        especially when we're talking over each other, on Webex.

7           The reporter also cannot record nonverbal responses, such as shaking your head,  
8        so it is important that you answer each question with an audible, verbal response.

9           For the benefit of the reporter and the record, there may be times where I spell a  
10       name or a word that we're using or that I ask that you do the same.

11           And we're only asking that you provide complete answers based on your best  
12       recollection. And if the question is not clear, which may happen, please just ask for  
13       clarification. If you do not know the answer, please simply say so.

14           And logically, if you need any breaks for comfort or just to take a pause, just let  
15       me know. Happy to accommodate that.

16           So throughout the deposition, I'm going to be directing your attention to exhibits  
17       that are going to be shared on the Webex screen. And when we refer you to a  
18       document, you can take your time to familiarize yourself with it before we discuss it.

19           So I'm going to share exhibit 1.

20           Do you recognize exhibit 1 as the subpoena and the accompanying documents  
21       that the select committee issued to you, Mr. Liggett?

22           The Witness. Yes.

23           ██████████ Thank you very much.

24           So you may only refuse to answer a question to preserve a privilege recognized by  
25       the select committee. If you refuse to answer a question based on a privilege, staff may

either proceed with the deposition or seek a ruling from the chairman on the objection.

2 If the chairman overrules such an objection, you are required to answer the question.

3 And our goal today is to ask questions relevant to the select committee's  
4 investigation with the hope that you will answer. If you have an objection or a privilege  
5 assertion, we'll ask that you assert it for the record.

6 I also want to remind you, as we do all witnesses, that it is unlawful to deliberately  
7 provide false information to Congress. Since this deposition is under oath, providing  
8 false information could result in criminal penalties, to include for perjury and/or providing  
9 false statements.

10 Do you understand, Mr. Liggett?

11 The Witness. Yes.

12 Thank you.

13 And as part of the deposition rules, you are not permitted to record the  
14 deposition. Can you confirm that you are not recording and will not record this  
15 deposition?

16 The Witness. Yeah, I'm not recording the deposition.

17 Thank you very much.

18 EXAMINATION

19 BY [REDACTED]

20 Q So we'll get into a little bit of background about yourself. How old are you,  
21 Mr. Liggett?

22 A 39.

23 Q And

## 24 A High school.

25 Q Thank you.

1           A    I'm a firearms instructor.

2           Q    Thank you very much.  Is that in Florida?

3           A    That's correct.

4           Q    Okay.  So then these are some other questions that we just ask everybody.

5                   So as part of the subpoena, you were asked to provide or produce relevant  
6                   documents, and you let me know that you didn't have any relevant documents.  So I just  
7                   want to confirm a couple of things on the record.

8                   You searched your computer for relevant documents, Mr. Liggett?

9           A    Yeah.  I'm not a very techy person.

10           Q    Okay.  Did you search your personal email as well?

11           A    Yes.

12           Q    And your cell phone for messages, such as Signal, WhatsApp, Telegram,  
13                   Twitter, including text messages?

14           A    Yeah.  I mean, I don't have any of that stuff.  Like, my Twitter is open  
15                   publicly and my Facebook is open publicly, so I would refer you to that if you would like to  
16                   go on there and look.

17           Q    Okay.  Thank you very much, Mr. Liggett.

18                   Do you consider yourself part of any Three Percenter organization?

19           A    No.

20           Q    Did you, during the November 2020 to January 2021 period, consider  
21                   yourself part of a Three Percenter organization?

22           A    No.  We were a group of constitutional conservatives.  During --

23           Q    What --

24           A    Go ahead.

25           Q    So was the name of a group you were part of Three Percenters, Guardians of

1       Freedom?

2           A    That's correct.

3           Q    So that is not a -- but you are saying that is not a Three Percenter  
4       organization?

5           A    No.  So during that time period, it was common, very common to have  
6       Three Percent logos on T-shirts and all kinds of different things like that, and that's what  
7       that was all about.

8           Q    Well, can you explain why you chose to use that logo?

9           A    It was kind of a trendy thing then.

10          Q    Okay.  What did the logo mean to you?

11          A    Which logo, the Guardians of Freedom logo or the Three Percent?

12          Q    The Three Percenter logo.

13          A    It was more or less a statement.

14          Q    A statement about what?

15          A    From 1776, 3 percent stood up to the British.

16          Q    Okay.  So did you believe in that Three Percenter --

17          A    What, that the 3 percent stood up to the British?  A hundred percent they  
18       did.

19          Q    Okay.  But you did not identify yourself as someone who would call  
20       yourself a Three Percenter?

21          A    No, definitely not.

22          Q    Okay.  So what was the statement -- what was the purpose of making that  
23       statement then?

24          A    Like I said, it was a trend then.  Before all of this happened with January 6th  
25       and things like that and there were open attacks on that, every single person that I knew

1 at the time, every single person in a gun shop or on a gun range or anywhere like that had  
2 T-shirts that had Three Percent on it, had hats that had Three Percent on it, patches that  
3 had Three Percent on it.

4 You know, Three Percent is not an organized thing. I mean, you know, you could  
5 support the 3 percent of people that stood up to the British. I mean, that's it. That's  
6 all it is.

7 Q Okay. So you're not aware of any national or regional or local organization  
8 of Three Percenters?

9 A That's actually like a Three Percent, like, organi- -- like a real Three Percent  
10 organization like -- I don't understand the question. I don't --

11 Q Yes. So I'm just trying to understand the difference, because the title of the  
12 group that you said you were part of was Three Percenters, Guardians of Freedom.

13 A Well, it's Guardians of Freedom.

14 Q Well, was it not Three Percenters? Is that what you're saying? It's not  
15 Three Percenters Guardians of Freedom?

16 A No. If you look -- if you look at the official group name, okay, that we had,  
17 it's Guardians of Freedom.

18 Q All right. Well, let me --

19 A That's the official group name.

20 Q I'm going to share an exhibit with you. One second. Sorry.

21 So this is an email -- this is exhibit 2. This is an email that a Tarra Hernandez sent  
22 to a Dustin Stockton on December 30th, 2020, and the subject is Welcome to Three  
23 Percenters, Guardians of Freedom.

24 A Yeah. I didn't send that email.

25 Q Correct. It says: Please be advised per the founder, Jeremy Liggett,

1 you've been moved and assigned as a full active member.

2 Is this your group, Guardians of Freedom?

3 A My group at the time was Guardians of Freedom, yes.

4 Q Do you know why Tarra Hernandez called it the Three Percenters, Guardians  
5 of Freedom?

6 A Like I said, at that time they were throwing that around. I didn't send that  
7 email out.

8 Q Correct. But, you know, I'm just wondering -- I'm just trying to tease out,  
9 basically -- you know, you said you weren't a Three Percenter organization. I'm asking if  
10 you were aware of national organizations that considered themselves to be Three  
11 Percenters --

12 A Yeah, I'm not aware. The only national organization that I know of that is  
13 an actual Three Percenter organization is the -- well, let me think. And they called  
14 themselves the Three Percenter-Originals.

15 Q Okay. What do you know about the Three Percenter-Originals?

16 A I don't know much about them. It was formed by a Mormon.

17 Q How did you hear about them?

18 A I mean, online stuff. I mean, you know -- the whole idea behind the Three  
19 Percent stuff, like I told you, there is no specific group. There is no specific ideology.  
20 It's literally based off of a term. That's it, so --

21 Q Right. But you're --

22 A I mean --

23 Q Sorry. Go ahead.

24 A I mean, if you would -- if you would like to call the group a Three Percent  
25 group, you're more than welcome to do that, I guess. If you look at the paperwork that I

1 filed with the State of Florida, okay, which is out there for anyone and everyone to see,  
2 the name of the group is not Guardians of Freedom, Three Percent. It's Guardians of  
3 Freedom.

4 Q Okay.

5 A That is the official title of the group that I founded, was Guardians of  
6 Freedom.

7 Q Did you ever use the phrase "Three Percenter, Guardians of Freedom" when  
8 you were describing the group during that time period?

9 A I don't recall. There's a possibility, yeah. I mean, like I said, it's a term  
10 that was passed around, you know.

11 Q Yeah. And is this the logo? Sorry. It's a little zoomed in.

12 A Yep, that's a logo.

13 Q Okay. In the middle, is that the Three Percenter logo that you described, or  
14 the --

15 A That could be described as a Three Percent logo, yes, it could be.

16 Q And on your website for this organization, did you describe it as a Three  
17 Percenter organization?

18 A On the website?

19 Q Yeah.

20 A I'm not familiar with the website.

21 Q Okay.

22 A Do you have a -- do you have a --

23 Q I'll show you exhibit 6. This is the Guardians of Freedom website. Was  
24 this a website that you put together or is there a different --

25 A No. No, I don't -- I don't -- I didn't put that together.

1           Q    Okay. So is there a national organization known as Guardians of Freedom?

2           A    Not when I was doing things with Guardians of Freedom, no.

3           Is there a date on that website where it was --

4           Q    I looked -- you can see up top, the 5/16/2022, so this was pulled yesterday.

5           A    Yeah. I'm not familiar with that website.

6           Q    Okay. Let me stop sharing for one second.

7           So you're saying that your Guardians of Freedom organization was independent

8           and not connected to any national organization known as Guardians of Freedom?

9           A    Any national organization? I don't understand what you mean by "national  
10           organization" or how you define it. We had people from across the U.S. that were in our  
11           chats and things like that.

12           Q    Okay. So was your organization then -- it pulled from people beyond  
13           Florida?

14           A    Yes, yes. Yeah.

15           Q    Okay. And it was, as far as you know, the only Guardians of Freedom  
16           organization that you were aware of?

17           A    No. No. There was offshoots of Guardians of Freedom.

18           Q    Okay. And what were these offshoots?

19           A    Yeah, I'm not familiar with them. I seen it come across. We had -- it's just  
20           like anything else. When you put a -- when you put a logo or anything else out publicly,  
21           people take it, do things with it, stuff like that.

22           Q    Do you know who these people were that were --

23           A    I have no idea. It wasn't worth my time.

24           Q    Okay. So meaning basically that, as far as you remember, there was your  
25           Guardians of Freedom group, and there was nothing that you answered to, like no

1 organization above you that you answered to?

2 A No.

3 Q Okay.

4 A No. We weren't connected to any other organization. No.

5 Q All right. Let me pull back up exhibit 2 then -- I'm sorry -- exhibit 7. It's a  
6 new one.

7 So is this the -- you mentioned a chat for Guardians of Freedom. Is this one of  
8 those chats?

9 A I can barely see that.

10 Q Oh, sorry. Is that better?

11 A I'm not -- that does not look familiar to me. Can you scroll down? I  
12 don't --

13 Q Sure. Do you see Guardians of Freedom, Three P, Guardians of Freedom?  
14 I imagine it's Three Percenter, Guardians of Freedom. This is from July 2020. You've  
15 got the Guardians of Freedom logo here that matches up with what was in --

16 A But if you notice in our logo, it doesn't say Guardians of Freedom, Three  
17 Percent. I mean, that Three Percent thing is a patch that has been put around by  
18 everybody. That's what I keep trying to explain to you. Like, it's not a -- I'm trying to  
19 read this whole thing. Sorry?

20 Q Take your time. Let me know if you need me to scroll.

21 A I don't -- that doesn't -- can you scroll down so I can read the rest of it?

22 Because I'm --

23 Q Uh-huh.

24 A I don't understand that. That does not -- that channel doesn't look familiar  
25 to me at all.

1                   Q     None of this looks familiar to you?

2                   A     No.  No.  And, honestly, it's kind of suspicious, because it only has 32

3     subscribers on it.

4                   Q     How many subscribers did your chat have?

5                   A     One time, close to 5,000.

6                   Q     And those were all people across the Nation?

7                   A     It was mostly out of Florida.  I mean, it could have been -- yeah.  I mean,

8     there could have been people from all over, yeah.  I mean, most of it was in Florida, you

9     know.

10                  Q     So here it says, Guardians of Freedom -- this is November 27, 2020 -- We are

11     the Three Percenters.  We are a national organization of patriotic citizens who love their

12     country --

13                  A     I read it.  I read it.  Like I said, I don't recognize this.

14                  Q     Okay.  So let's go back to exhibit 2.

15                  And, again, this is the welcoming email to a Dustin Stockton that Tarra Hernandez

16     sent.  And it says:  Here is the app to join Telegram.

17                  So do you remember having a Telegram chat regarding the freedom -- your

18     organization?

19                  A     Yeah.  I mean, at one time we had a Telegram chat, yeah.

20                  Q     And you're representing that it wasn't the Telegram chat that I just showed

21     to you?

22                  A     That does not look familiar to me at all whatsoever.

23                  Q     Okay.  So also in this welcome email, Ms. Hernandez says:  We share

24     information to each other throughout the Nation as Guardians of Freedom and learn of

25     meetings, rallies, events, training, et cetera, in the ClickUp system and on Telegram.

1                   So were there events that your organization put on throughout the country?

2                   A    No, not throughout the country.  No.

3                   Q    Okay.  So --

4                   A    I'm sorry.  Where do you see that at?  I can't --

5                   Q    Yep.  It's the third paragraph, last sentence, "We share information."

6                   A    Can you scroll down?

7                   Q    Oh, I'm sorry.

8                   A    Sorry.  My screen --

9                   Q    That's okay.  It's where my cursor is.  Can you see it?

10                  A    No, sir.

11                  Q    So we have the paragraph that begins with:  "You have been emailed the

12                  link."

13                  A    Oh, okay, okay.  I see your cursor now.

14                  Q    Yeah.  So, "We share information."

15                  A    Yeah.  If you read that properly, it says:  We share information to each

16                  other throughout the Nation as Guardians of Freedom and learn of meetings, rallies,

17                  events, and training, et cetera.  "Learn of."

18                  Q    Okay.

19                  A    It doesn't say anything in there about us holding any rallies, events, training,

20                  et cetera.  It says "learn of."

21                  Q    Sure.  So what meetings, rallies, events, and trainings were you sharing

22                  information about?

23                  A    Political rallies.

24                  Q    Political rallies for --

25                  A    Any kind of political rally.

1           Q    You say --

2           A    The whole reason -- the whole reason of the group, right, was to go to  
3   political rallies. That was the whole consensus of the group is political rallies, things like  
4   that.

5           Q    Political rallies for a particular candidate, for a particular party, or just in  
6   general?

7           A    No, just in general. And also assist with natural disasters, things like that.  
8   If there was a hurricane or something like that in Florida and they needed help clearing  
9   roads and stuff like that, I mean, that's what that was all about.

10          Q    Okay. And what did you do -- what did your organization do when it  
11   showed up at political rallies?

12          A    We did what everybody else did. We held flags.

13          Q    Right. But was there a particular -- were there particular candidates that  
14   you decided to go rally for or was it more general?

15          A    Any candidate that was constitutional in nature.

16          Q    What does "constitutional in nature" mean?

17          A    Well, believe in the Constitution of the United States.

18          Q    Do you think there are candidates for political office that do not believe in  
19   the Constitution of the United States?

20          A    Of course there are.

21          Q    Who would they be?

22          A    Well, what's the Second Amendment of the Constitution say?

23          Q    Well, I'm not here to answer your questions, but I'm happy to tell you it's  
24   about a certain right to bear arms.

25          A    It's about a certain right to bear arms?

1           Q    Uh-huh.

2           A    It gives us the right to bear arms in this country, and there are political  
3           candidates that do not believe in our Second Amendment right to bear arms, bottom line.  
4           So would I support a political candidate that does not believe in our Second Amendment?  
5           No, definitely not. So, no, I would not go to a rally for that individual.

6           Q    Okay.

7           A    No.

8           Q    So your --

9           A    I think what your question is is you're -- I think what your real question  
10          is -- correct me if I'm wrong -- the question that you're attempting to ask is, did you go to  
11          Democratic rallies versus Republican rallies or Republican rallies versus Democratic  
12          rallies? Is that the question that you -- is that what you're asking?

13          Q    No, it wasn't, but feel free to answer that question if it's one side or the  
14          other, but --

15          A    Like I said, we would support any candidate that supported the Constitution.  
16          That's what this country is founded on, right?

17          Q    And in your view, part of that -- a strong part of it, it sounds like -- and  
18          correct me if I'm wrong -- would be some sort of support for the Second Amendment?

19          A    Any of the Constitution.

20          Q    Okay.

21          A    First Amendment, Second Amendment, Fourth Amendment, Third  
22          Amendment. It doesn't matter. It's the Constitution. The Constitution is the  
23          Constitution.

24          Q    Right. I'm just wondering how many political candidates out there, in your  
25          mind, do not believe that there is a Second Amendment --

1           A    There's quite a few.

2           Q    -- to the Constitution.

3           A    There's quite a bit of them. I mean, you can get on CNN and see that.

4           Q    Is it your view that regulation of arms is not constitutional?

5           A    Say -- I'm sorry. Ask that one more time.

6           Q    I'm just wondering -- it's actually really not important. We'll just move on.

7           In terms of like -- you mentioned you guys responded to natural disasters and  
8        stuff. Did you work with local law enforcement to coordinate that?

9           A    No.

10          Q    Okay. Were there groups that asked for your help or you were just doing  
11        good citizenship?

12          A    Just good citizen stuff. That's it, man.

13          Q    All right. And so also on this list is learning of trainings. What trainings  
14        were you sharing information about?

15          A    Any kind of training, whether it be to get your concealed weapons license,  
16        you know, CPR. It could be the national Stop the Bleed stuff. Anything that would  
17        help, you know, a citizen or a good citizen help out in their community.

18          Q    And were these any trainings -- did you ever put on trainings, or were these  
19        only trainings that other people were putting on?

20          A    Typically, it was trainings that other people would put on. In the past,  
21        we've done some concealed weapons trainings.

22          Q    Okay. And that was just in Florida or anywhere else in the country?

23          A    No. Just in Florida.

24          Q    About how many people from your group would show up to those?

25          A    Not very many.

1           Q    Okay.  What's the ClickUp system?

2           A    The what?

3           Q    The ClickUp system.  So you have -- share information that we just talked  
4    about in the ClickUp system.

5           A    I'm not -- like I told you prior to, I'm not very familiar with the tech part of  
6    this stuff.  I don't really -- I don't really know what the ClickUp system is.

7           Q    Okay.

8           A    Probably look it up or maybe if you have something that you can show me, I  
9    can explain it maybe.

10          Q    Well, I'm showing the -- this is the attachment to the email.  This is a  
11    welcome letter.  Says:  Hello.  Welcome to Three Percenter, Guardians of Freedom.

12          A    Uh-huh.

13          Q    And where is that ClickUp?

14          Do you see this paragraph that begins, "Once you are vetted"?

15          A    Uh-huh.

16          Q    It says, You will get an email from ClickUp to create a login and sign up.  It's  
17    required and mandatory.  It's required to sign in once a day.

18          And it's -- I don't want to read every word of this.  Feel free to if you'd like to.

19          But I can summarize for you, basically, it's where people went for updates from counsel,  
20    leads, administration regarding trainings, documents, events, upcoming rallies within the  
21    organization.

22          A    Yeah.  I'm reading it, yeah.

23          I think with that ClickUp system, okay -- now, don't hold me to this, okay, because  
24    I'm not a hundred percent familiar with it, right.  But I believe with the ClickUp system,  
25    it's just a way to, A, communicate, right, and then find other people in your specific area,

1 if that makes sense. I believe that's what that is.

2 Q So I've never used ClickUp, but it says here, Under the mission folder, select  
3 training and go to the right side of the screen. And then it looks like a video that  
4 everybody had to watch.

5 So did you put together a training video for --

6 A No.

7 Q -- your members regarding --

8 A No.

9 Q Do you know who did?

10 A I have -- honestly, I don't know.

11 Q Okay.

12 A I don't recall. And I'm not familiar with ClickUp.

13 Q So, I guess, who is Tarra Hernandez then? She's the one who sent this  
14 email.

15 A She was the person at the time, I believe, that was sending emails.

16 Q Okay. But what was her role with Guardians of Freedom?

17 A Sending emails.

18 Q Did she write this welcome letter?

19 A I don't know. I don't know. I mean, I didn't send this out. I don't know.  
20 I don't know if she wrote it. I have no clue.

21 Q Did you write it?

22 A I didn't write that letter, I can tell you that.

23 Q Okay.

24 A I'm not that smart. I'd have all kinds of spelling errors in there.

25 Q Do you know who would have written this letter if not you and not

1 Ms. Hernandez?

2 A I have no idea. I don't know.

3 Q Were there other people in leadership roles in Guardians of Freedom?

4 A There were people that had administrative roles.

5 Q And who were they?

6 A Are you talking about names?

7 Q Yeah.

8 A Like, I only know -- I don't know like first name, last name. I don't know  
9 that.

10 Q How did you know these people?

11 A By nicknames.

12 Q Were those Telegram handles?

13 A You can call them Telegram handles, yeah.

14 Q Or aliases, I guess, is a better term.

15 A No. I mean, they used Telegram handles. No one used their real names,  
16 so I have, you know, no idea.

17 Q So I'm just trying to get a sense, you were the founder of this group, correct?

18 A That's correct.

19 Q And what were your day-to-day responsibilities for the organization?

20 A I just founded it.

21 Q Well, how did people join the organization?

22 A They found us through social media, looking stuff up, things like that.

23 Q So this email seems to be a whole -- there's a whole process outlined. So  
24 back to this --

25 A Yeah, I know I was reading some of it.

1           Q     So we'll go to this little part, second paragraph on this page.

2                   As you are newly added non-members, we have two mandatory meetings why  
3     you've chosen to join the Three Percenters. And then there's a third meeting for a  
4     swearing in for our patriot oath.

5                   So can you describe the process to join the Guardians of Freedom?

6           A     You'd find online something like that. You'd say, Hey, I want to be a  
7     member. You would submit, apparently, paperwork to be a member, and that was  
8     about it.

9           Q     Who looked at the paperwork?

10          A     That, I do not know.

11          Q     Did you tell anybody to look at the paperwork?

12          A     Did I tell anybody to look at the paperwork personally? No.

13          Q     Well, yeah. As the founder, who did you delegate the authority to to bring  
14     new members in?

15          A     As the founder of this group, okay, back then, okay, the only thing that I did  
16     was found the group. Does that make sense? I didn't send out emails. I didn't do  
17     any of that stuff. I didn't set up this ClickUp thing. I'm not familiar with the ClickUp  
18     process. Okay? I would go and I would speak at events and things like that, and that  
19     was it.

20          Q     Okay. But as a founder, do you know who did all this administrative  
21     framework for your group?

22          A     I'm trying to recall all of the names. You know, when you have an  
23     organization, especially a startup organization like this, with a lot of constitutional  
24     patriots, right, it's a revolving door.

25          Q     Can you describe that a little bit?

1           A    Yeah. I mean, people come and go. It's a revolving door. People come  
2 and go. There is, you know -- there's not a lot of -- what's the best word to use?  
3 There's not a lot of organization, right, at all.

4           You know, this is something that kind of more or less started out as a hobby. It  
5 was fun. You know, it was fun to meet new people, things like that, people that shared  
6 your belief system in the Constitution. And, you know, it's fun to go talk to events. It's  
7 more or less, I would say, a social club than anything else, right?

8           You know, as far as the Three Percent stuff, it's like I told you before on that, at  
9 that time, okay, that Three Percent stuff did not have a negative tone to it whatsoever at  
10 all, right. I mean, this is something that was being put on T-shirts, on hats, on all of this  
11 stuff. There was no negative undertone to it whatsoever at all, you know. Wasn't a  
12 militia.

13           You know, I noticed in the paperwork that you guys put forth, right, you guys said  
14 militia leader. It wasn't a militia. There was no ill intent there whatsoever at all.

15           Q    So let me actually ask you that. So do you consider -- or did you consider at  
16 the time Guardians of Freedom to be a militia?

17           A    Absolutely not. As a matter of fact, it was the total opposite.

18           Q    And why would you say that?

19           A    That's the question you should be asking. You know, it was --

20           Q    All right. We were probably talking over each other. I was asking, why do  
21 you say that?

22           A    Yeah. Like I said, that was probably the question that you should have  
23 asked from the beginning because, you know, there was plenty of times. So when you  
24 have any kind of an organization, it doesn't matter what organization it is, right. You  
25 have sometimes bad people that try to get into that organization, okay.

1           I can use the church as an example. Okay. So let's say you start a church, right.  
2       You know, there's a possibility that at some point within that church that you'll get those  
3       extreme people with those extreme ideologies that attempt to enter that church, right?  
4       I'm just using that as an example, you know.

5           Guardians of Freedom was no exception to that at all whatsoever, and we were  
6       very, very clear. I was very, very clear, okay, that we were, A, not a militia, okay; and  
7       that, B, there would be no violence or anything violent taking place, period, at anything  
8       that we were at. I mean, that's not what we were there for.

9           Q    Okay. So is it, in your view, that a militia in general might have been at  
10      rallies, events for violence then?

11          A    That militias could be?

12          Q    Yes. I'm just wondering why you wouldn't -- you seem to strongly not want  
13      to be identified with a militia. So I'm wondering, what about militias gave you  
14      discomfort?

15          A    What I'm telling you is, is 110 percent we were not a militia, okay. And any  
16      reasonable, prudent person, I guess would be the best way to explain it, could go to  
17      Google and google "militia." And what comes up? I mean, these guys at these ranches  
18      that are, you know, not letting FBI agents come in, and different things like that.

19           So, I mean, you know, it's definitely not, at the time when I was with Guardians of  
20      Freedom, what we were about and what we were.

21          Q    Okay. And then I guess you mentioned some extreme members, like any  
22      organization came in, how did you find out about those people?

23          A    Oh, it wasn't hard. I mean, they would make comments that were  
24      inappropriate.

25          Q    Like a --

1           A    And as soon as you made an inappropriate comment, you're not our people,  
2    you're gone, go away, get out of here, we don't want to deal with you.

3           Q    So what would be considered an inappropriate comment?

4           A    Anything that had anything to do with any kind of violence, anything that  
5    had anything to do with any kind of malicious intent with any weapons or anything like  
6    that.

7           Q    And how would -- who would take this person out or how would that  
8    happen?

9           A    No. I mean, you would -- everybody kind of policed everybody in a way, I  
10   guess, is the best way to explain it. I mean, if you said something inappropriate, it was,  
11   you're gone. I mean, that was it, was the general consensus. You're not, you know --

12          Q    And so if we scroll back down in this welcome email to the last paragraph, it  
13   says, Counsel, leads, and our patriot members of the Three Percenter, Guardians of  
14   Freedom welcome you to our mission.

15          What was the council?

16          A    A council was the general founders, which would obviously be me. I was a  
17   founder.

18          Q    Okay. And were there other founders?

19          A    Yeah, there were other founders.

20          Q    Who would have been another founder?

21          A    I don't recall their names at this point. There was a female and I believe  
22   two or three other men.

23          Q    How did you meet these people?

24          A    Just through internet.

25          Q    Okay. And you guys agreed together to found Guardians of Freedom, or

1 you were the founder and they were sort of part of the administration?

2 A No, it was all together.

3 Q And you just met like on Facebook or other --

4 A Yeah. I don't even recall. It was a social media platform.

5 Q Did you ever meet in person with them?

6 A Oh, of course, yeah.

7 Q Were they also Florida residents then?

8 A Yes, sir.

9 Q And was one of them Tarra Hernandez?

10 A No.

11 Q Matthew Robinson?

12 A No.

13 Q Okay. Were either of them part of the Guardians of Freedom group?

14 A Matthew was.

15 Q Okay. And this email, Tarra Hernandez, her title -- sorry to keep scrolling  
16 on you -- was central mainland AO assistant lead/administrator.

17 A Yeah, I don't understand. The admin people, they were admin. I mean,  
18 they weren't necessarily part of the group. I mean, they just sent out the emails, things  
19 like that.

20 Q Well, who told them to send out these emails?

21 A I would assume the State leads.

22 Q Okay. So your organization had your founders, which is the council, the  
23 five or so of you, and then there were also State leads. So was there a State lead for all  
24 50 States?

25 A No. There was one State lead.

1           Q    Just one State lead. Okay. Who is the State lead?

2           A    He went by the name Monster.

3           Q    Monster. And how did he get the title of State lead?

4           A    They -- everyone in the group picked him.

5           Q    And what was the State lead's responsibilities?

6           A    He just essentially made sure that, you know, he got people to events and  
7   things like that.

8           Q    Did that include getting new members into the organization?

9           A    I don't believe the State lead -- I don't believe so, no.

10          Q    Okay. So then, again -- I'm just trying to figure out -- this seems like a very  
11   structured, you know, organization.

12          A    It wasn't very structured at all.

13          Q    And it's pretty -- with the email and joining a chat and then having three  
14   different meetings -- we can go through it again -- it is your testimony that you do not  
15   know who set up this apparatus for new members to join?

16          A    No, I have no -- no, I don't know who actually set up the ClickUp.

17          Q    Okay. And then, again, the last line in this email, thank you as we look  
18   forward to working alongside you and welcome to Three Percenters.

19          A    Uh-huh.

20          Q    It's not welcome to Guardians of Freedom.

21          A    Yeah.

22          Q    But I understand that, in your view, there's a different connotation of Three  
23   Percenter post-January 6th, pre-January 6th. But at this time, were you talking to other  
24   Three Percenter organizations or other groups like Guardians of Freedom that wore the  
25   patch and considered themselves to be at least part of the ideology at the time?

1           A    During this time period --

2           Q    Yes.

3           A    It's like I told you before, during this time period, okay, everybody was  
4    calling themselves Three Percenters, everybody.  There was no -- there was no, to my  
5    knowledge, specific group.

6           And I'll refer you to the Department of Justice and the FBI.  I mean, they'll tell  
7    you the same thing, and they're the investigative authority for this whole country.

8           Q    Were you aware of other groups like yourself, though, that included in their  
9    title Three Percenters?

10          A    Oh, of course, probably hundreds.

11          Q    And do you know if it was because, like you, one, it was trendy and, two,  
12    there was some sort of belief about 1776 and the Three Percenter?

13          A    Say that one more time about 1776.

14          Q    Yeah, a bad question.  Sorry.

15          So your answer to why you used Three Percenter was that it was sort of trendy  
16    and because it had the connotation of 1776 with the idea that only 3 percent of the  
17    people beat back the British.

18          Do you know if other organizations were also using Three Percenter in the same  
19    way?

20          A    As far as the name of the group?

21          Q    Yeah.

22          A    Like I told you, I mean, at the time everybody was.  It was all over T-shirts  
23    and hats.  I mean, you know --

24          Q    Right.  I guess, then, the sort of last question about Three Percenters, and  
25    you mentioned 1776.  So why was the idea of 1776 so important to you and your group?

1           A    Because it's the history of our country.  There wouldn't be a -- there  
2    wouldn't have been an America.  There wouldn't have been all of this stuff that we have  
3    if we wouldn't have got -- if we wouldn't have beat the British in 1776.  I mean, that's it.  
4    Now, the French did help, right?

5           Q    They did help.

6           A    You know, other than that, I mean, you know, that's what it is about.  I  
7    mean, these are the -- these are the original American heroes, right?

8           Q    So I guess we'll move on to exhibit 4.

9           A    All right.

10          Q    And we'll talk about this text message a little more later, but I just want to  
11    focus on these 10 names here.  So you're listed as first.  You said Matthew Robinson  
12    was also a part of Guardians of Freedom.  Is that correct?

13          A    No, he was not.

14          Q    Earlier you said that Matthew was part of your group.  So is Matthew --

15          A    So let me explain this with Matthew, okay.  Matthew was never, like,  
16    officially a member of Guardians of Freedom.  Does that make sense?

17          Q    Well, why don't you tell me then how he was affiliated with Guardians of  
18    Freedom.

19          A    So, yes, let me go back.  So that's an even longer story.

20          So Matthew -- okay.  I met Matthew at some speaking engagements and things  
21    like that, and Matthew's really good on a bullhorn.  You know, Matthew had his own  
22    stuff going on at the time, right.  And he would do a lot of stuff with us here and there,  
23    but he was never officially a part of the group at all --

24          Q    Okay.

25          A    -- if that makes sense.  I don't -- like, he was never an official member of

1 the group.

2 Q Would you know who was official members, then, if you weren't part of  
3 the -- like the administration for --

4 A Well, I would know if Matthew was an official member or not because  
5 Matthew is a good friend of mine.

6 Q Okay. Was Matthew part of other groups then?

7 A Oh, yeah, yeah. At one time he was part of other groups.

8 Q Like Proud Boys?

9 A That, I don't know. That's something that you would have to ask Matthew.

10 Q Okay. Do you know what groups he was a part of?

11 A I don't know. I think he was at one point a part of -- it's in Lake County,  
12 Republican Party of Lake County.

13 Q Oh, okay. So a political organization?

14 A Yeah.

15 Q And so we also see Tarra Nicole Hernandez again on this list.

16 A Yeah.

17 Q And, again, you don't remember whether she was a member of Guardians of  
18 Freedom?

19 A I don't -- so I don't believe she was ever an official member at the time.

20 Q Okay.

21 A I'm trying to think back.

22 So let's look at this -- can we do something? Can we look at this first message  
23 here? Is that a text message? Is that what it is?

24 Q Yeah, it's a text message.

25 A Okay. So let's go through the names real quick --

1 Q Yeah.

2 A -- and I'll tell you who --

3 Q Sure.

4 A So Matthew was not a member. Tarra was not an official member. Brian  
5 was. Joseph was not. Mark was. Paul was not. I have no clue who Walter Bentley  
6 Eldon is. Timothy Allen was. And I have no idea who Daniel Wyatt Summers is.

7 Q All right. In terms of the -- so Brian then, he was a member of Guardians of  
8 Freedom.

9 A No. Brian was.

10 Q Yeah, Brian was.

11 A Yes.

12 Q And how did you know him?

13 A He was a buddy of mine.

14 Q Okay. So were these -- the people that you knew on the list, were they all  
15 friends of yours?

16 A Oh, yeah.

17 Q Okay. From Florida?

18 A Yes, sir.

19 Q So, like, you know, everyone on that list, except for the two you did not  
20 know, were friends of yours, and it just happened that a few of them were members of  
21 Guardians of Freedom. Is that correct?

22 A Yes, sir.

23 Q And do you have any idea where those two other names, I think it was  
24 Walter and Daniel I think you said --

25 A No, I have no idea who Walter Bentley Eldon is or Daniel Wyatt Summers. I

1 don't remember those individuals at all. No.

2 Q Thank you.

3 We'll come back to that in a little bit once we get to January 6th.

4 A Yeah.

5 Q So just to tie up a little more about the Three Percenter, Guardians of  
6 Freedom, this is another email from Ms. Hernandez in January of 2021, you know, just  
7 promoting an event and getting people together.

8 Do you know the Threepers Crew? Do you know what that is?

9 A I don't recall. Which event was this for? What was the date?

10 Q It's a January 21st event at Crazy Gators.

11 A Yeah, I don't recall. I don't even remember if I was at that event.

12 Q Sure. And we'll see Tarra's title seems to have changed to national  
13 administration at the bottom.

14 A Yeah. She was an administrator, yeah.

15 Q Okay. And so you know she's an administrator. Do you know why she  
16 changed her title to national administration?

17 A No, I don't recall.

18 Q And do you think another founder would have given her that official title or  
19 the State lead?

20 A You know, I'm not sure. I don't recall.

21 Q Okay. Let's pull back up this website again quickly. Fortunately, this thing  
22 is covering -- I can't move it.

23 So you don't recognize this website?

24 A No.

25 Q Okay. Do you think that someone in your organization might have created

1 it without you knowing? And I'm sorry, this is a very bad download of it.

2 A I mean, you know, there's a possibility. I don't recall the website. You've  
3 got to remember, I was just a founder, so I don't, you know -- I didn't have my hands in  
4 every little single aspect of what was going on, if that makes sense.

5 Q I've never founded an organization, so just take this as complete ignorance,  
6 but as the founder, didn't you want to know, like, who did have their hands in these  
7 decisions?

8 A No, man. Honestly, this was like a fun thing for us to do. You know, like I  
9 said, we were helping out in the community, you know. We were going to rallies and,  
10 you know, I was speaking here and there. I mean -- you know.

11 Q Okay. And we don't need to go through this whole website.

12 You also mentioned -- and I'll pull this up -- you were aware of a group that called  
13 themselves Three Percent-Originals?

14 A Yeah, the T -- yeah. TT -- yeah.

15 Q Did you ever see -- this is the --

16 A Is that The Three Percenters-Originals? Is that what that is?

17 Q Correct. So this is something they posted on December 16th, 2020, and it's  
18 a statement, their stance on election fraud.

19 So you see in the first paragraph: We have discussed this as a national council  
20 and have agreed that we certainly need to be engaged in this fight for election integrity.

21 And then in the second paragraph: We, The Three Percenters-Original, stand  
22 fully behind President Trump, our patriotic generals and military leaders, our  
23 constitutional conservative Senators.

24 And then the next sentence: We stand ready and are standing by to answer the  
25 call from our President should the need arise that we the people are needed to take back

1 our country from the pure evil that is conspiring to steal our country away from the  
2 American people.

3 Have you ever see this before?

4 A No. No, absolutely not. No.

5 Q Around December 2020, would this message have resonated with you?

6 A No. No.

7 Q Okay. Why not?

8 A Not in this context, no. No.

9 Q Can you explain why not?

10 A Did -- okay. So stand behind President Trump? Definitely. I mean, he  
11 was our President at the time. I could understand standing behind -- I assume they're  
12 talking about standing behind the military leaders too. And standing behind the  
13 conservative Senators, I can get that. Hold on.

14 What I don't unders- -- what I would not stand by, depending on how they mean  
15 this, is where it says "a call from our President should need arise that we the people are  
16 needed to take back our country from the pure evil that is conspiring to steal our country  
17 away from the American people."

18 Q Okay. So why not that part?

19 A So give me a second here.

20 "We are ready to enter into battle with General Flynn leading the charge," that's  
21 absolute -- that's ridiculous, absolutely utterly ridiculous.

22 Q And why is that ridiculous?

23 A To me it looks like in here in a way -- and, there again, this is just pure my  
24 opinion, okay? Like, I didn't obviously write this, but from the way this reads,  
25 there's -- sorry, I don't mean to laugh, but they're saying that General Flynn is some kind

1 of full leader of a battle? I don't understand. That's just preposterous. I -- no. No,  
2 definitely not. No. No.

3 And besides that, look, man, it's like this at the end of the day. Okay? And this  
4 is the rhetoric that I was talking about. Okay? So I want you to think about this, right.

5 So they're ready to enter into battle with General -- what battle? Where are  
6 they battling? What Army are they fighting? Who's the enemy? Is it your neighbor?  
7 Is it John at the grocery store?

8 See, there's a difference between defending the Constitution and this weird crap  
9 that they have written in here. I don't -- no. No.

10 Q Okay. I take it that's why you did not assign yourself with The Three  
11 Percenters-Original?

12 A No, definitely not.

13 Q Okay. We'll look at exhibit 9 then.

14 So this is another Three Percenters-Original message that they put out. It's  
15 called a general call to action.

16 A I can't wait to read this. This is stuff I haven't seen, so --

17 Q Well, you just answered my next question. I was just going to say, did you  
18 ever see this?

19 A No, this is stuff I've never seen, so this is kind of interesting. Upon care --

20 Q I'm going to try to zoom in a little bit, just give you -- let you read it.

21 A People aren't trying to say that I had anything to do with this, are they?

22 Q I have not seen any information to tell --

23 A Because if that's the case, I'm going to make like a whole post saying I don't  
24 have anything to do -- this is craziness.

25 Q My only question to you, and you already answered it, was have you ever

1       seen this before? And it sounds like you have not seen this before.

2           A    No, I've never seen that before. As a matter of fact, you know, there's no  
3       doubt whatsoever that I was in Washington, D.C., on the 5th and the 6th. It's public  
4       knowledge. Okay?

5           Q    Yes.

6           A    And I have nothing to hide about that. I didn't even see anyone that -- I did  
7       not run into anyone, I did not see anyone that said that they were affiliated with these  
8       individuals at all whatsoever.

9           Q    Interesting. No one -- did you run into other Three Percenters then or  
10      people that were wearing Three Percenter patches?

11          A    Well, that's the thing. Like, everyone -- that's the thing. Everyone would  
12      wear this stuff. I mean, it was a thing, like, I mean, the T-shirts, the hats, stuff like that,  
13      you know.

14          Q    Understood. But then, you know, we have this call to action, so --

15          A    Yeah. I mean, that's crazy.

16          Q    And you don't know, have any idea when they sent this out?

17          A    Well, I mean, there's a date that says 1/6/2021.

18          Q    Yeah, that's when they called into action, but -- unlike the last one which had  
19      a date to send. That's completely fine.

20           So I will -- getting back to your Guardians of Freedom, you mentioned there are  
21      other State -- you know, people in other States and some shoot-offs.

22           Sorry this is very small. So this is a Facebook message from a Jayne Locke, if you  
23      can see the top, J-a-y-n-e L-o-c-k-e. And on January 17th, 2021, Ms. Locke says: For  
24      those of you that weren't able to get to our event and want information on Guardians of  
25      Freedom --

1           A    Hold on. This was January what?

2           Q    This was post-January 6th, so I'm just trying to get a sense of --

3           A    Yeah, I don't --

4           Q    This isn't important, but --

5           A    So let me be very, very clear on this with you guys. Okay? I don't know

6           anything about the organization post-January 6th at all.

1

2 [12:00 p.m.]

3

BY [REDACTED]

4 Q Okay. Did you drop out of the organization after January 6th?

5 A Kind of, sort of, you could say that, yeah.

6 Q And why was that?

7 A I made a lot of people not happy.

8 Q Who did you make not happy?

9 A Everybody. Everybody.

10 Q What do you mean?

11 A Well, because after -- so I told you, the organization prior to, okay, had  
12 nothing to do with anything violent whatsoever at all, period. We were not a militia,  
13 nothing like that, okay? Nothing, okay?

14 And if there was individuals that tried to infiltrate the group or try to get in the  
15 group that had any of that kind of stuff, we were very, very quick -- I was very, very quick,  
16 anybody was very, very quick, said no, no, no, no. That's not what this is, okay?

17 And, so, after January 6th, I looked at the totality of everything, okay? And I  
18 said, listen -- because all this stuff was being put out about 3 percent this, 3 percent that,  
19 3 percent this, 3 percent that. And like I told you before, pre-January 6th, that was  
20 okay, okay? It was. There was no negative inclination to it, there was no drama  
21 behind it. It was on T-shirts, stuff like that. It was a novelty thing, right?

22 I mean, you know, go through. I mean, you could call, you know, our first  
23 President in a way a Three Percenter, right? Okay. It was more of a patriotic thing.  
24 Military units would use that patch, right? Okay. Think about it.

25 So after that, and all this stuff happened, it was like whoa, whoa, whoa, wait a

1 minute. No, no, no. So I told everybody -- now, remember, like I told you before,  
2 okay, just because I was the founder doesn't mean that I had my hands in everything,  
3 okay? That's not how that worked, okay?

4 This is a constitutional group. These people are free people. It's like you're a  
5 free person, I'm a free person, things like that, right? Okay. I give opinions, right?  
6 Well, I gave an unpopular opinion. I told them -- I told everybody. I said, Listen, you  
7 know, I'm not subscribing to that mess, all right? I'm not subscribing to the stuff that  
8 happened at the Capitol, all right?

9 I was a law enforcement officer. In my opinion, if you struck a law enforcement  
10 officer at the Capitol and you did so illegally, okay, then you should be charged with  
11 striking that law enforcement officer. Does that make sense?

12 If they told you not to go in that building and you went inside that building, okay,  
13 and it was illegal, then you shouldn't have done that and there's going to be  
14 consequences to it, right?

15 Q So were there people in the group who disagreed with that?

16 A Oh, yeah. Yeah. Apparently, yeah.

17 Q And how did you -- go ahead.

18 A So I told them, I said, you know, I don't -- I don't want to be a part of  
19 anything that has this stuff, right? I don't -- I'm not subscribing to that -- that 3 percent  
20 ideology that they're saying that that is, right? And it just -- it made people mad.

21 So I was immediately kicked out of all the chats and immediately put out of  
22 everything and honestly, you know, hindsight it was probably something that they  
23 planned to do for a very long time, I would assume. I don't know. So after that, you  
24 know, I honestly can't answer any questions on that because I don't know.

25 Q That's fine.

1                   A     I no longer had access to chats or anything like that, you know. I can tell  
2     you prior to, did we have people that came into the chats that said something that they  
3     shouldn't have said, of course, we did. I mean, you know -- you know, we're allowing,  
4     you know, pretty much anybody in, you know, as long as they, you know, didn't have like  
5     this huge, huge criminal record or some kind of history of doing bad things to people,  
6     right? Okay.

7                   And people get angry and they say things that they shouldn't say out of anger.  
8     And like I said, when that would happen, it's a no-go, you know. We don't want to be  
9     involved in it.

10                  Q     Can you expand a little on the before -- before you're getting kicked out. It  
11     sounds like you and people in the group had a disagreement about what either -- what  
12     Three Percenter meant, or what people should've done on January 6th, like, what was  
13     good and bad.

14                  Before that, were people talking in any way that made you uncomfortable about  
15     what would happen on January 6th?

16                  A     You know, honestly, no. There was people that had made comments that I  
17     seen on social media and things like that. I think if -- I think if your more direct question  
18     is, was anything planned that I have knowledge of in any of these 3 percent stuff, right,  
19     and let me tell you, if -- if anyone would have, okay, planned an attack, okay, any kind  
20     of -- of violent attack, I would've immediately notified authorities if I thought people were  
21     going to get hurt, right? I would've.

22                  There was no -- there was no talk -- there was no talk of, you know, going to the  
23     Capitol and doing anything at the Capitol. You know, as far as like the people that I were  
24     around, there was no conspiracy to -- to go there and do anything at the Capitol at all,  
25     whatsoever, you know.

1           I spoke on the 5th, okay, and, you know, was I proud of saying the F-word on  
2 stage? No. You've seen it. Come on, this is all -- you guys have all the information,  
3 man, okay?

4           So I guess to answer your question more specifically, not to my knowledge. And  
5 I feel, like, if I would've seen something that was, you know, direct to we're going to do  
6 this thing that happened, I would've definitely said something to somebody about it.

7           If there would have been, you know, any kind of illegal weapons involved or  
8 anything like that, I would've said something to somebody.

9           Q     So what were you seeing on social media that you mentioned quickly seeing  
10 some things that people were posting in general?

11          A     Just -- it's all public knowledge, man. I mean, it was all over Facebook and  
12 Twitter and stuff like that. You know, people -- there was people that were angry and  
13 they were saying stuff that I wouldn't have said, you know. There's a difference  
14 between making a post, and saying we need to take back our country, right? And then  
15 making a post that says, we need to take back our country using, you know, any kind of  
16 force or anything like that.

17          Does that make sense?

18          Q     So you saw a post -- you saw a post that were saying, take back our country  
19 with some sort of violence about January 6th?

20          A     Of course, there was people out there that posted that on Facebook. I  
21 mean, I'm sure the FBI knocked on their doors and stuff like that, you know. It came  
22 across news feeds and stuff. You guys know that. It was on the news, you know.  
23 We've all seen it. Everyone in the country's seen it.

24          Q     But it wasn't in your Guardians of Freedom Telegram chat that specific --

25          A     Not that I'm -- not -- not that I'm aware of, no. And if anything did come

1 across one of the -- one of the chats like that, I would hope that someone would've said  
2 something about it or something like that.

3 Now, could there might have been things that was posted in there that could be  
4 misconstrued, possibly. I mean, I'm guilty of saying on multiple occasions, we need to  
5 take back our country, right? But that doesn't have anything to do with violence, you  
6 know. When I say the term, "we need to take back our country," I mean, politically, I  
7 mean, spiritually.

8 Does that make sense?

9 Q I understand what you're saying. So I want to back up a little before  
10 January 6th quickly and we'll finish up with those questions. Were you at the  
11 November 14th rally in Washington, D.C.?

12 A I think I was at the December.

13 Q You were at the December.

14 A I think I went three times. I think I went twice, if I remember. I think I  
15 was at the December. Wasn't there one in December?

16 Q Yes, December 12th.

17 A Yeah. I was at the one in December.

18 Q Was that -- did you go with other members of Guardians of Freedom?

19 A Oh, I went with all kinds of people, yeah.

20 Q Was it, like, an organized event for your group?

21 A I wouldn't say organized. I would say that people from the group went,  
22 people from not in the group went. It was just like the January 5th and January 6th  
23 rally. I mean, there were people that went with us that wasn't a part of the group, you  
24 know.

25 Q Let me share exhibit 19 with you.

1           A    Uh-huh.

2           Q    This is a post -- looks like a poster, says March for Trump, December 12th,  
3    and here you'll see Guardians of Freedom.  Can you see it?  I'm sorry if it's too small.

4           A    Yeah.

5           Q    Okay.  Guardians of Freedom will be attending to ensure the safety and  
6    well-being of the marchers and supporters.  Do you recognize this poster?

7           A    No, I don't.  No, I don't recognize that poster.  It looks good, though.

8           Q    Is that your Guardians of Freedom patch in the middle down there?

9           A    Yeah.  That's a logo, yeah.  Yeah, it is.

10          Q    So was your group Guardians of Freedom going to D.C. to provide any sort of  
11    security on December 12th?

12          A    No.  No.

13          Q    Did you work with the First Amendment Praetorian or Oath Keepers on  
14    providing security --

15          A    Who?

16          Q    First Amendment Praetorian.

17          A    I have no idea who that is.

18          Q    Okay.  Did you meet up with any Proud Boys on December 12th, 2020?

19          A    There was some -- yeah, there were some at the rally.  We didn't meet up  
20    with them, but there were some there.  Yeah.

21          Q    Did you coordinate with them at all about going to the rally?

22          A    No.  Those guys are different.

23          Q    And what do you mean?

24          A    Huh?

25          Q    What do you mean by that?

1           A    I mean, they're just different kind of guys.  They're not -- it's not my thing.

2           Q    In what sense?

3           A    Huh?

4           Q    In what sense like?

5           A    I mean, you know, they're all about, like, drinking alcohol and stuff.

6           Q    Is there any other reason that you would consider them not your guys?

7           A    Yeah.  I mean, they're just not my people.  They're not my type of people.

8           I don't subscribe to the same belief system.  I think they call themselves no chauvinist or

9           something like that.  I don't know much about them, honestly.  You know, I can tell you

10          Enrique's always been super nice when you see him somewhere and he says hi.  That's

11          about it.

12          Q    So you have met Enrique Tarrio?

13          A    Oh, of course.  He lives in Florida.

14          Q    Florida's a big State, though.  So where did you meet him?

15          A    Well, at rallies in Florida.  I mean, he would show up in like -- with big

16          groups of guys at these rallies in Florida.  He'd shake everybody's hands.  He would say

17          hi to everybody, you know.

18          Q    Did you have a personal relationship with Mr. Tarrio?

19          A    No.  No.

20          Q    So it was just meeting up at these rallies --

21          A    Yeah.  Just saying hi.  Never talked to him on the phone or anything like

22          that.  He did hand me a business card one time and I was really impressed with it.

23          Q    Okay.  Did you ever communicate with him on Signal or Telegram or --

24          A    Not that I recall, no.

25          Q    Any text messages?

1           A    No, no.

2           Q    Okay. I'm going to pull up page 8 of this exhibit. This is an email blast  
3           that Dustin Stockton sent out to some people on December 16th. And then he's talking  
4           about being in an elevator with Charles Bowman, with the 3 percent team in D.C.

5           A    I don't know why they kept using that term.

6           Q    Well, this is on Saturday December 12th and if you remember back from that  
7           welcome email, Dustin Stockton is the one who joined your group, but he's in the back  
8           right here giving a thumbs up.

9           A    Yeah. I know Dustin.

10          Q    Oh, you do? Okay. How do you know Dustin Stockton?

11          A    I've met him at rallies and things like that. He's done speaking  
12          engagements. He seems like a nice guy.

13          Q    Did he ever invite you to do speaking engagements?

14          A    Yeah, uh-huh.

15          Q    Did you meet up with him on December 12th?

16          A    I'm trying to remember if -- I'm sure there's a possibility I did. Is that  
17          picture from December 12th?

18          Q    This picture is from December 12th.

19          A    Oh, yeah. Then I met with him on December 12th.

20          Q    Okay. Do you see yourself in this picture?

21          A    No. I was not with him in that picture.

22          Q    Do you know who these people are, though?

23          A    I know -- I know three of them.

24          Q    And who are they, and which ones?

25          A    Dustin Stockton, Charles Bowman, and that's Matthew Robinson in the back

1 without the mask on smiling.

2 Q Okay. And why were sure you -- after seeing this picture, why were you  
3 sure that you had met up with Dustin --

4 A Because I couldn't remember if that picture was taken on the 5th, or if it was  
5 taken in December. You got to remember, man, this stuff happened a long time ago.

6 Q I know, but were you there when this picture was taken?

7 A No. No.

8 Q Okay.

9 A I was in D.C., but I was not there, no. Wherever they're -- I don't know  
10 where they're at. I think that's an elevator, right?

11 Q Have you seen this picture before?

12 A Yeah, I've seen it before.

13 Q And where have you seen it?

14 A On social media, if I remember right.

15 Q So you see the Three Percent patch and you can't really read what the other  
16 patch is on the guy in the front, but were these members of Guardians of Freedom, to  
17 your knowledge?

18 A I don't know because the only one I recognize out of them is Dustin, Charles,  
19 and Matt.

20 Q So was Matt a part of another Three Percenter group?

21 A No, not that I know of.

22 Q Was it -- did Guardians of Freedom also show up to the December 12th  
23 dressed in similar attire to these guys?

24 A I mean, it looks like they're wearing normal clothes, so yeah. I mean --

25 Q With patches --

1           A    Everybody --

2           Q    -- and it looks like a vest --

3           A    We're going back to the same thing. Everybody wore that stuff, man. It

4   wasn't --

5           Q    Well, is there a reason that everybody wore vests to these rallies?

6           A    Oh, a 100 percent there was a reason.

7           Q    And what was it?

8           A    Antifa and Black Lives Matter are violent people and they -- huh?

9           Q    You expected the possibility of violence at the rally?

10          A    We didn't expect -- no. What we expected is, is we expected antifa and

11         BLM, because that's what they do, to attack conservatives with knives and Molotov

12         cocktails and everything else.

13          Q    Right. So there was a possibility --

14          A    The violent left. Yeah, the violent left. It was a possibility the violent left.

15         That's what they do. We all know that. Look at the 2020 riots.

16          Q    And that -- did your group also prepare similarly for that possibility?

17          A    What's that? Did we wear protective stuff?

18          Q    Yes.

19          A    Yes, of course. Who wouldn't?

20          Q    Thank you. So going back then to January 6th --

21          A    Uh-huh.

22          Q    -- do you remember when you decided to go to the rally on January 6th?

23          A    Do I -- yeah. I mean, I got called by Charles and said, Hey, we need guys to

24         marshal. We need some volunteers to marshal the -- marshal the event. And I said,

25         okay. No problem. And I said, I'll get people together to marshal the event. And he

1 said, all right. You know, it's voluntary basis. And I said, that's fine.

2 And I called around to everybody I knew in Florida and said, hey, you know, if you  
3 want to help out with this event and marshal the event, you know, we'd like to have you  
4 out there with us. And then that was it.

5 Q So how do you know Charles Bowman?

6 A I met him through just the going around to political rallies and things.

7 Q Were they Women for America First rallies or any other rallies?

8 A Some of them were. They were just random rallies.

9 Q Okay. And can you just describe what marshaling is?

10 A I can tell you what we did.

11 Q Sure.

12 A Most of the time I sit there and I stared at those -- what do they call it,  
13 security barriers. And it was cold. We passed out some signs in the events. We  
14 showed people where the bathrooms were and we walked people to their seats. That  
15 was about it.

16 Q Did you consider marshaling to be security or some other sort of oversight  
17 role?

18 A No. Everybody tosses -- everyone's been tossing around that security  
19 thing, right? And honestly, when we were there marshaling, we didn't do any security  
20 stuff at all. It was really boring. We just walked people to their seats and stuff, you  
21 know.

22 Q Yep.

23 A It's what we did.

24 Q We'll just quickly then, pull back up that text message we were looking at  
25 earlier?

1 A Yeah.

2 Q Sorry. I lost it. There it is. So that's what the 10 of you listed here, you  
3 were marshaling the January 6th event at the Ellipse?

4 A Say that one more time. I'm sorry.

5 Q So when you said you called around and got people to marshal an event on  
6 January 6th, was it at the Ellipse?

7 A Yeah.

8 Q And it was the 10 people we went through earlier with those 10 the  
9 marshals?

10 A Yeah, but you have to remember that Charles or any of the other guys could  
11 have added other people in there.

12 Q Right.

13 A We were just -- we were just pulling volunteers from anywhere.

14 Q So that explains why you might not know two of the names?

15 A Yeah. That's a good possibility.

16 Q Okay. And then --

17 A I don't recognize those two names at all.

18 Q Sure. And you see other "24 straight volunteers." So one sec. Did you  
19 help pull together the list of volunteers, too?

20 A No.

21 Q Okay.

22 A No, I didn't do any paperwork stuff. I didn't do any of that stuff.

23 Q Not paperwork, but did you call people who would act as volunteers?

24 A Oh, of course.

25 Q And were they members of Guardians of Freedom, too?

1           A    Some of them were, some of them weren't.

2           Q    Okay. Can you just quickly describe the difference between a volunteer  
3    and a marshal?

4           A    I think it's the same thing, right?

5           Q    You tell me.

6           A    I don't know. I would assume that a volunteer and a marshal is the same  
7    thing.

8           Q    Did you guys do the same things on January 6th?

9           A    Yeah.

10          Q    Great. All right. So, in terms of -- do you know when you found out about  
11    the existence of the January 6th rally not necessarily when you would be going?

12          A    I don't -- I don't recall -- I believe it was, like -- like, a week before, maybe  
13    2 weeks before possibly. Don't quote me on that, because I don't -- I don't know the  
14    exact date. I know it was a pain in the butt because it was right before, and I was  
15    thinking why didn't you guys have volunteers before this if you guys knew you were going  
16    to do it.

17          Q    Yeah. Do you remember a tweet by President Trump on December 19th  
18    that mentioned a wild protest?

19          A    Do you have it?

20          Q    Yeah. Let's take a look. So this is his tweet. It was on the morning of  
21    December 19th talking about the Peter Navarro report --

22          A    Oh, and he said big protest in D.C.?

23          Q    Yep. "Be there, will be wild."

24          A    Yeah. I mean, I assumed President Trump in that tweet -- is that a tweet?

25          Q    Yep.

1           A    I'm not cool enough for Twitter. I don't have that many followers on  
2 Twitter. Yeah. So I assumed that that tweet is just saying there's a protest. I mean --

3           Q    Oh, no. I'm not asking to you read President Trump's mind, I was  
4 wondering if --

5           A    Oh, okay.

6           Q    -- had you seen this tweet or --

7           A    I've seen it. It's been all over national news.

8           Q    Did you see it in that time period, though, like December 19th before  
9 January 6th?

10          A    Probably. It was shared quite a bit.

11          Q    Okay. So you remember it being shared a lot?

12          A    Oh, of course, yeah.

13          Q    Okay. Do you remember people talking about, or a wild protest?

14          A    No. I don't think people really, like -- at the time, I don't think people  
15 really, like, looked into it that way.

16          Q    And when you said people shared it a lot, did they seem excited or  
17 motivated about going to January 6th after the tweet?

18          A    I don't -- I don't know, honestly. I wish I could answer that.

19          Q    Did you have any reaction when you saw this tweet or heard about it?

20          A    Oh, yeah. I said, Oh, cool. There's going to be a protest in D.C.

21          Q    And it didn't affect whether you were going to go, though?

22          A    No. I mean -- no, not at all.

23          Q    So let's take a look at something you did post on December 30th, 2020.

24          You say: Three Percent will show in record numbers in D.C. The gloves are off, antifa.

25          A    Uh-huh.

1           Q    Where did you get the idea that there would be record numbers of 3 percent  
2    in D.C.?

3           A    I didn't get that.

4           Q    So why did you post this?

5           A    It's a post I came up with.

6           Q    Okay. You just posted it?

7           A    Yeah. I mean, I didn't get -- yeah. How would I know if they were going  
8    to show up in record numbers?

9           Q    Were you talking to other groups that identified themselves as Three  
10   Percenters at the time?

11          A    Oh, no. No.

12          Q    You didn't know of any groups that were going to D.C., any other Three  
13   Percenters?

14          A    No. That's a general statement. You got to remember the context at the  
15   time, okay? When we say Three Percent at that time, right, okay, that is not an  
16   organized Three Percent movement. Does that make sense? That is in the context of,  
17   you know, every single person that believes in the Constitution is a Three Percenter,  
18   right?

19          Q    So you just imagined that a lot of people who assign themselves with the  
20   idea of Three Percenter would be in Washington, D.C. on January 6th?

21          A    No. Here's -- here's the way I looked at that, okay? I want you to think  
22   about this, all right? If we wouldn't have stood up to the British, all right, okay, would  
23   we have the America that we have?

24          Q    There's no way to answer that question, but also I understand -- you're  
25   talking --

1           A    You see what I'm saying? I mean, the context is, is just constitutional  
2    conservatives in general, right? This has nothing to do with a specific Three Percent  
3    group --

4           Q    Sure.

5           A    -- if that makes sense.

6           Q    Yeah. I hear you. And you're talking about 1776. Did you think  
7    January 6th at all had anything to do with 1776? Like, a new 1776?

8           A    No. I mean, look, this was December 30th, right?

9           Q    Uh-huh.

10          A    Look what I put in here: The gloves are off, antifa. It had nothing to do  
11    with the government.

12          Q    Did you know that on January 6th Congress would be certifying the electoral  
13    college vote for Joe Biden?

14          A    Honestly, you're going to make fun of me when I say this, all right? I didn't  
15    really quite, at the time, understand all that was going on with it, right? I knew -- and  
16    what I was focused on was, A, I was getting to speak on the 5th, which was exciting.  
17    And then, B, I was getting to volunteer or marshal, whatever you want to call it at the  
18    Trump rally itself on the Ellipse and that was exciting.

19          It would be like if Joe Biden called you to the White House, right, and, you know,  
20    you were able to do something at the White House. You'd be excited about it, right?  
21    Same thing, you know. I can tell you this: Hindsight, if I would've known that what  
22    was going to happen happened, I wouldn't have been there. I wouldn't have been  
23    there.

24          Q    Understood. Was anyone you're talking to, though, just in this language of  
25    Three Percenter about 1776, were they tying January 6th to 1776 in any way?

1           A    Not that I recall anyone -- anything specific. I mean, like I said, this was a  
2 long time ago, and, you know, I don't know.

3           Q    So --

4           A    Not that I recall.

5           Q    Okay. On December 30th and thereafter before January 6th, were you  
6 aware of members of the Guardians of Freedom going to January 6th and other  
7 Guardians of Freedom organizations going to January 6th?

8           A    Well, I don't know of any other Guardians of Freedom organization going. I  
9 mean, I knew that I was going and I had people not only from Guardians of Freedom, but  
10 from, you know, just people that I knew going. I mean, everybody was going.

11          Q    Understood. So we were going for about an hour and a half now.

12          Q    Do you want to take a quick 5-minute break?

13          A    No, I'm good.

14          Q    You good? All right.

15          So I think we talked about this quickly on our call. Let me see if I can do this.  
16 I'm going to share a little video you made.

17          A    Is it the video that I made about defensive stuff in D.C.?

18          Q    Yeah, exactly.

19          A    Yeah. You don't have to show it. That's a waste of time.

20          Q    Okay.

21          A    What questions do you have?

22          Q    Well, I was wondering if you can recall who the person talking next to you  
23 was. He's a little taller than you, he's got maybe an Australian accent.

24          A    Oh, everybody knows who that is. It's on Twitter. You guys could've just  
25 looked that up on Twitter, dude.

1           Q    Do you believe Twitter on that? That's Matthew Robinson?

2           A    Of course, it is.

3           Q    Okay. And I think I know the answer to this, but just for the record, why  
4 did you feel the need to make the safety video?

5           A    Well, the story behind the safety video is, I had a lot of people reach out to  
6 me and they were saying, Hey, look, you know, these older individuals, these people are  
7 going down there, they're getting attacked by antifa and BLM, they're just wanting to  
8 have their First Amendment rights heard, da, da, da, da, da, da.

9           You know, you do conceal weapons training, you do defensive training, and things  
10 like that. He said, You know, could you do us a favor and could you make a video?

11           And this is just -- this is not any particular person or people, okay? This is  
12 multiple people, right, had said something about it. So I said, Well -- I said, Yeah. I  
13 said, I'll just do one and I'll post it on my Facebook page, and that's what I did.

14           And if you notice in there, like, it's all about defending yourself. It has nothing to  
15 do with anything offensively at all whatsoever, you know?

16           And it wasn't directed towards the government in any way whatsoever. It was  
17 directed towards, Okay, this antifa and this Black Lives Matter threat, you know, where  
18 these people are attacking people and stuff like that. That's what it was directed  
19 towards.

20           Q    So fair to say there was a lot of talk and anxiety about the possibility of  
21 violence on January 6th and people asked you to help out?

22           A    No. No. The talk -- the talk on January 6th, okay, was -- had nothing to do  
23 with any kind of violence with the government whatsoever. It was antifa and BLM.  
24 People were scared. Antifa and BLM were attacking people, okay, at rallies and things.  
25 And they were -- they were afraid. They were afraid of getting hit with sticks and things

1 like that, and so their question was, what can we legally take to Washington, D.C. if we  
2 get -- if we get attacked by antifa or BLM?

3 You know, I was shocked the day of the rally. There was no antifa or BLM  
4 anywhere to be seen. That shocked me. Where were they all? Think about that.

5 Q All right. Understood. So, in terms of Matthew Robinson then, so this is a  
6 chat where we have someone named MagnumGOF who called him or herself the Florida  
7 State lead. This chat's called "C.A.M.P. Official."

8 A I don't know what that is.

9 Q Okay. Do you know who this Florida State lead MagnumGOF is?

10 A Yeah.

11 Q GOF, Guardians of Freedom?

12 A Yes.

13 Q Is that Matthew Robinson?

14 A No.

15 Q Who is it?

16 A That is -- oh, man. Can you go back to the text message thread?

17 Q Sure. Sure. It's not much of a text message thread, but --

18 A No, no, no, no. The one you showed me originally from Dustin or  
19 whoever?

20 Q Oh, I apologize. There you go.

21 A I believe it's Mark Andrew Clarke.

22 Q So was he the State lead for the Guardians of Freedom?

23 A At the time I don't recall.

24 Q Did he ever become a State lead for the Guardians of Freedom?

25 A So, listen, don't quote me on this, because I quit doing stuff -- well, I was

1       wore out. I was kind of in the background, if that makes sense.

2           Q    Okay.

3           A    I believe at the time on the D.C. and the January, he was not on the  
4   December and January. Do you have a date on that post he made?

5           Q    I do not.

6           A    Can you go back to that? So -- I don't know what that is, that C.A.M.P.  
7   Official stuff.

8           Q    Yeah.

9           A    I don't know what that is.

10          Q    Okay. I actually have another one we can look at that might jog your  
11   memory or if it doesn't jog your memory, that's okay. So this is a Mayway. Do you  
12   know the social media site Mayway?

13          A    Nope.

14          Q    It's -- just for background, it's just another social media site. This is an  
15   American chat and you see Guardians of Freedom, this Ernest Bledsoe guy, Constitutional  
16   American Militia Project mentions Guardians of Freedom, and has this map, and I'll just  
17   scroll quickly down to the bottom.

18          A    No, no, no, no, no.

19          Q    So we have the MagnumGOF Florida State.

20          A    No, no, no, no, no. Look at the date. Scroll down.

21          Q    Yeah, I see the dates, April 14th --

22          A    I had nothing to do with any of that. I don't -- no. I don't know who -- I  
23   don't know what that C.A.M.P. Official is. I don't know what the American militia stuff  
24   is. I don't know any of that.

25          Q    All right. Do you recognize this Guardians of Freedom patch that's a little

1 different from yours?

2 A No. That was -- that was -- that was the one that I wanted originally.

3 Q You wanted this patch originally?

4 A Do you notice that there's no Three Percent in it?

5 Q Correct. Well, did you ever use this patch and then it changed?

6 A No.

7 Q Okay.

8 A No. I tried -- I tried to get them to take the Three Percent out and use  
9 something else in there.

10 Q Did you --

11 A But that's why it's --

12 Q Do you know of another Guardians of Freedom group of Florida used this  
13 patch, maybe out of Homestead, Florida?

14 A They could've. I don't know of one, though.

15 Q Okay.

16 A Where is Homestead? What part of Florida is that in?

17 Q Southern Florida.

18 A Say again?

19 Q Southern Florida.

20 A Southern Florida?

21 Q Yeah.

22 A I don't know.

23 Q Okay. And have you ever seen this map before dividing the country into  
24 five regions?

25 A Nope.

1 Q Okay. Thank you.

2 A They've been busy bees.

3 Q I take it all that happened after you left?

4 A Had to have because I don't recognize any of that stuff.

5 Q All right. In terms of January 5th, you spoke. Do you remember who  
6 asked you to speak?

7 A Charles Bowman.

8 Q Charles Bowman asked you to speak. At which rally?

9 A At the one on the 5th at Freedom Plaza.

10 [REDACTED] Okay. I think my colleague [REDACTED], if he's still on -- yeah, I see  
11 him still on. He actually had a couple follow-up questions about Mr. Bowman, so I'll let  
12 him pop in.

13 The Witness. Yeah.

14 BY [REDACTED]

15 Q Hello, Mr. Liggett. How you doing?

16 A Good. How are you?

17 Q Good. Yeah, I just want to ask you a few questions about Mr. Bowman.

18 Can you tell me about when you first met Mr. Bowman?

19 A Couple years ago. I don't remember the exact date. It was -- it was well  
20 before -- it was well before December/January.

21 Q Okay. And how did you meet him?

22 A I met him at, I believe, a rally.

23 Q Can you just describe that meeting? What was he doing at the rally?

24 What were you doing? How did you guys --

25 A We were just hanging out. Just hanging out.

1           Q    And did somebody introduce you to him?

2           A    I don't believe so.

3           Q    Do you remember what the event was or what the rally was?

4           A    I don't recall the exact -- I mean, I've been to so many rallies in the last 3 or  
5    4 years, I don't recall.

6           Q    So after that first meeting, I take it, you stayed in touch somehow.  Is that  
7    correct?

8           A    With Charles?  No, it wasn't like that.  No.  When I first -- when I first  
9    met Charles Bowman, it wasn't -- it wasn't love at first sight, no.  We didn't exchange  
10   phone numbers and text each other, no.

11          Q    Then describe to me how -- you met him once at the rally, and then,  
12    obviously, fast-forward a couple years, he's inviting you to come perform some role at the  
13    Women for America First event.  Just describe to me your relationship then during that  
14   time period?

15          A    We really didn't have one, to be honest with you.  I mean, you know, he  
16    would -- he would -- called me every once in a while, you know.  Did you hear about  
17    such and such, such and such, such and such as far as, you know, politics, like, you know?  
18    Half the time I didn't understand what he was talking about because I had stuff to do with  
19    politics that, quite frankly, I never understood, you know, the different committees and  
20   stuff like that.

21          Q    As far as you were aware, what was his involvement in politics?  Did he  
22    work for somebody or a particular organization?

23          A    No.  No.  No, not that I know of.  I mean, Charles is not -- Charles is not  
24    the kind of person that will get really friendly with you.  He's a very kind of cut-and-dry  
25   individual.

1           Q     So when he was talking to you about politics, was it like a particular event or  
2     something he was trying to get you involved in or just --

3           A     No, just in general. Just shooting bullshit about it. I mean, he was a super  
4     nice guy.

5           Q     So when you talked to him about January 5th and 6th, what did you  
6     understand his involvement in planning for those events to be?

7           A     You know, honestly, I don't know. I can tell you what he did.

8           Q     Yeah, sure. Tell me what he did.

9           A     He called me on the phone and asked me if I wanted to speak on the 5th.

10          Q     And did he say -- you know, did he describe what organization he was -- he  
11     was representing when he asked you to speak?

12          A     No. I know that I met Greg Locke.

13          Q     Say that again?

14          A     I know that I met Greg Locke, Pastor Greg Locke. He was in the tent with  
15     us.

16          Q     You met him through Mr. Bowman?

17          A     Yeah. I met him in a tent.

18          Q     Okay. Well, we'll come back to that in one second. And I might've missed  
19     it earlier, but did you already discuss the organization Women for America First? Are  
20     you familiar with that organization?

21          A     Yeah, I'm familiar with them.

22          Q     Did Mr. Bowman describe what his relationship was to that organization?

23          A     Not that I recall, no. No, he didn't talk a lot about stuff like that, honestly.

24          Q     How about individuals associated with that group? So I'll start with the  
25     Chafians, Cindy or Scott Chafian. Did he ever mention them?

1           A    I have no clue who they are.

2           Q    Okay. Those names aren't familiar to you?

3           A    No.

4           Q    Do you know if Mr. Bowman being associated with any particular  
5   organization, like, we mentioned Women for America First already. Were there any  
6   other groups that you knew he was a member of?

7           A    March for Bus Trump Tour.

8           Q    Okay. That's one. Are there any others that you can think of?

9           A    Uh-huh. No.

10          Q    And then -- so other than -- I understand he invited you to speak, but then  
11   obviously the text messages that we've looked at discussed you performing some role as  
12   a marshal or some sort of volunteer for the event. Is that right?

13          A    Uh-huh.

14          Q    Okay.

15          A    Yes, sir.

16          Q    And what did he describe to you that you'd be doing at those events in that  
17   role, not speaking, but in that marshal or security role?

18          A    So there was nothing mentioned about security whatsoever at all to me. It  
19   was volunteering for the event.

20          Q    Okay. And what were you volunteering to do?

21          A    From what he explained, we were just going to help up with set up with  
22   escorting people back and forth to the bathrooms, like I said, things like that. Between  
23   me and you, I was a little disappointed.

24          Q    Why were you escorting people to and from bathrooms?

25          A    Because it was a really big place and people would ask where the bathrooms

1        were. And we would walk them and show them.

2            Q    Okay. So it was merely to locate the bathrooms for them?

3            A    You mean what we did there?

4            Q    Yeah, or while you were walking people to the bathrooms.

5            A    Say again? You're confusing me because --

6            Q    My question is, why were you escorting people to bathrooms?

7            A    Because it was a really big area and people would go, Where are the  
8        bathrooms?

9            Q    Okay.

10           A    We were passing out Trump signs for the rally. What else were we doing?  
11           We were -- we were walking people over to the VIP seating when they showed us  
12           whatever their little things were that they had to get in. That was it. That place was  
13           covered in Secret Service. They didn't need us there for security.

14           Q    Do you know, or did you have any conversations with Mr. Bowman about  
15           other individuals or groups that he reached out to to escort people to bathrooms?

16           A    Not that I remember, no.

17           Q    Okay. Were you ever -- how did you communicate with Mr. Bowman  
18           about these plans?

19           A    How did I -- on the phone.

20           Q    Just through like a phone call or like a text message?

21           A    Yeah, a phone call. On the phone, phone call. And what you have to  
22           understand is, is, like, there was no -- you're going to do this, this, this, this, and this. So  
23           we need you to volunteer, we need people to volunteer for the rally. I mean, that was  
24           kind of the gist of it.

25           Q    Did you ever text with Mr. Bowman?

1           A    I'm sure I probably have at some point, yeah.

2           Q    At around that time, do you think you might have?

3           A    Possibly, yeah.

4           Q    Okay. Did you look in your phone for text messages with Mr. Bowman?

5           A    Yeah. I don't -- I told you guys, I didn't have any of that stuff. I've

6   switched phones three times since then.

7           Q    Okay. So the phone that you had that you used at that time you no longer

8   have?

9           A    No. No.

10          Q    What did you do with that phone?

11          A    What do you mean? I turned it back in to the phone company.

12          Q    Okay. I don't know. Some people keep those phones.

13          A    No. I traded it back in.

14          Q    Okay. Did you ever talk with him on any messaging apps like Signal or

15   Telegram?

16          A    At one point I'm pretty sure I spoke with him on Telegram.

17          Q    Okay.

18          A    Yeah.

19          Q    And did you search Telegram for those messages?

20          A    Yeah. I don't have any. And I got -- the group kicked me off Telegram.

21          Q    Yeah. So, then, you did look for those messages?

22          A    Uh-huh.

23          Q    And then how about Signal? Did you ever use Signal with Mr. Bowman?

24          A    No. Not that I recall, no. No.

25          Q    And, then, you mentioned that the group kicked you off. Is that what you

1 said?

2 A Uh-huh.

3 Q Okay. What is the group that you're talking about?

4 A Your voice is messing up in your --

5 Q What was the group that you were talking about that you were kicked off  
6 of?

7 A Guardians of Freedom kicked me off the Telegram chats.

8 Q Okay. So Mr. Bowman was on the Guardians of Freedom Telegram chats?

9 A Yeah, at one point.

10 Q Was there anybody else from the Women for America First organization that  
11 were on those chats?

12 A No. No.

13 Q And was Mr. Bowman a member of Guardians of Freedom?

14 A No. No.

15 Q Okay. Why was he on the Telegram chats?

16 A I sent him an invite.

17 Q And why did you send him an invite if he wasn't a member?

18 A Because he wanted to make sure that there was no one in our group that  
19 were saying anything bad about anything, because like I told you guys prior to or earlier,  
20 that there's a lot of people -- when you have -- when you have organizations that try to  
21 get into the organization -- they're bad people.

22 Like, from my knowledge, you know, the few times that I -- that I spoke with him, I  
23 mean, they don't want to be affiliated with any kind of extremists or anything like that. I  
24 mean, that's --

25 Q I just want to understand what group this was that you're talking about,

1 because I know previously you mentioned that the Guardians of Freedom chat that you  
2 had in mind had like 5,000 subscribers. So I'm assuming that's not the message  
3 that -- that's not the chat you're talking about right now?

4 A What do you mean?

5 Q Was it the Telegram chat with 5,000 members that you invited Mr. Bowman  
6 to?

7 A Yeah.

8 Q And he was vetting 5,000 people on the chat?

9 A No, but, I mean, he had access to see what people were saying in there.

10 Q Okay. And so, I guess I'm just confused. What was the point of inviting  
11 Mr. Bowman to vet such a large group?

12 A Okay. So let me go back, okay? I did not vet -- I did not put Mr. Bowman  
13 in there to vet every single person, okay? I put him in there so he could see in the  
14 chats -- this is something I did. This is not, like, it was, like, Oh, well, you know, you need  
15 to do this and you need to do this and you need to do that.

16 I put Mr. Bowman in those chats so he could see, okay, what our group was about.  
17 He could see this group is a nonviolent group. This group is a group that, you know,  
18 wants to do stuff in the community and things like that. That's all there was to it.

19 Q And so, he wanted to understand what Guardians of Freedom was before he  
20 had you all come and volunteer --

21 A That's not what I said.

22 Q Then what was --

23 A That's not what I said.

24 Q I'm just asking the question. So what was -- what was the reason that he  
25 needed to understand that Guardians of Freedom wasn't a violent group?

1           A    But I just -- see, here's what you're doing, okay?  You're trying to put words  
2    in my mouth, in my opinion.

3           Q    I'm really just asking a question here.  I'm just confused about what --

4           A    No.  It's the way you're wording the question.  It's the way you're wording  
5    the question, okay?

6           Q    Sure.  I'm happy to clarify --

7           A    I never said -- and I was very, very clear, okay?  Mr. Bowman did not  
8    request to be in the chats.  I put him in there.

9           Does that make sense?

10          Q    Understood.  Got it.  Thanks for the clarification.

11          A    So the question that you're asking me contradicts what I said.

12          Does that make sense?

13          Q    Understood, and appreciate the clarification.

14          So what was your reason for showing Mr. Bowman the content of the chats in  
15    helping him understand what Guardians of Freedom was?

16          A    Because at the time, okay, I was proud of the group.  I was proud of what  
17    the group was doing in the community.  I was proud that, you know, we went to a lady's  
18    house and helped her trim the trees out of her yard because she was 80 years old, and,  
19    you know, the city was saying that she had to cut a tree down or something like that.

20          Does that make sense?  And wouldn't you be proud of being a part of something  
21    like that?

22          Q    Yeah.  That makes absolutely sense to me.  So I was just curious, or I'm  
23    still trying to understand, you know, why were you showing that to Mr. Bowman as  
24    opposed to anybody else?

25          A    Because the only person I was talking to at the time was Mr. Bowman.

1           Q    Okay. And what time period are you talking about here? Are you talking  
2    about right around January 5th or 6th or was that earlier?

3           A    No. It was way before -- it was before that. It was before that.

4           Q    Do you have any idea about what time frame that was?

5           A    No. I mean, probably a year, 2 years, I don't know. I mean, you know -- I  
6    mean, we're -- we're -- we're way behind the curve ball on this. I wish you guys  
7    would've talked to me on the 7th or the 8th, right?

8               I mean, so it's kind of hard because you're talking to me almost 2 years later, and  
9    I'm trying -- you know I want to answer your questions and I want to be honest when I  
10   answer the questions, but you got to remember, there's a lot of confusion. It was a long  
11   time ago.

12           Q    Yeah, understood.

13           A    And you're asking very specific questions. You know, when you ask a  
14    specific date like that, I don't remember, man. I just put him in the chats. I mean, just  
15    like you would with your friend if you had a group or an organization, right, you know?

16           Q    No, that's helpful information. Yeah. That's helpful information. I was  
17    just trying to understand the general time period.

18               So Mr. Bowman had been on the Guardians of Freedom's chat for about around a  
19    year, I guess, is what you said, a year or two?

20           A    Could be. I mean, could be a year -- I don't know. Could have been  
21    6 months or so. I don't know. Around that time frame somewhere.

22           Q    Got it. And so, you know, kind of letting him understand your group, or  
23    helping him understand what your group was doing, was that -- what was the purpose of  
24    that? Did you -- I guess help me understand that.

25           A    Because I liked the guy. I wanted him to be a part of what we were doing

1 in the community.

2 Q Okay. And so were you trying to get him to join Guardians of Freedom?

3 A No. I never asked him.

4 Q And so he, I guess, is familiar with your group and that's how he came to ask  
5 you to speak on the 5th and volunteer as marshals?

6 A Well, I don't -- so when he asked us to volunteer for marshals, he didn't call  
7 me and ask for the group to volunteer as marshals. That's not how that worked, you  
8 know? He said, Hey -- he goes, I know you know a lot of people, right? He says, you go  
9 around and speak and stuff like that.

10 Now, I'm paraphrasing. I'm not saying exactly what happened in the  
11 conversation; I'm just generalizing it, okay? This was a long time ago, but he said, We  
12 need volunteers, can you get volunteers together? He never said anything to the effect  
13 of get with Guardians of Freedom -- it was nothing like that. He just says, see if you can  
14 find some volunteers. I told him, I said, I can probably find some volunteers.

15 And, of course, I have this group of constitutional conservatives, right, that want  
16 to do stuff in their community that don't mind volunteering, okay? You got to  
17 remember, these are the -- with this group, you know, we were going and cleaning up  
18 cemeteries; like, literally, going and cleaning up cemeteries, okay?

19 So, why not, you know?

20 Q And I think you said you weren't really aware of who else he was reaching  
21 out to to --

22 A No. I have no clues. No. I have no clue.

23 Q Did he ever mention to you -- or actually, let me just ask you about a couple  
24 different groups. And I think you might've mentioned this one before, or [REDACTED] did.  
25 Are you familiar with First Amendment Praetorians?

1           A    No.

2           Q    You've never heard that name before?

3           A    No.  Are they a bad group?

4           Q    I don't categorize --

5           A    If I found out who they are, that's why I'm asking.

6           Q    Yeah.  Yeah.

7           A    I don't know.  I don't know them.

8           Q    Yeah.  I haven't really categorized groups as good or bad necessarily, just  
9       one of the groups involved in doing some of the volunteer work for the same event that  
10      you did.

11          A    Oh, yeah.  No.  I never -- no one ever mentioned anything about them.

12          A    Matter of fact, no one even introduced themselves from that, no.  No.

13          Q    Okay.  And then, I know you said you are familiar with the Proud Boys and  
14      met Mr. Tarrio.

15          A    Yeah.

16          Q    Did you ever hear Mr. Bowman talk about the Proud Boys?

17          A    No.  Sorry.  I'm grabbing a Coke.  No, I did not.  Not at all.

18          Q    And my question might have been a little unclear.  I don't mean just in  
19      relation to January 5th or 6th, but did you ever talk to Mr. Bowman about the Proud  
20      Boys?

21          A    I mean, I probably did at some point maybe.  I don't remember.  I mean,  
22      who hasn't talked about the Proud Boys?  It's -- I mean, think about it -- I mean, you  
23      know, I probably said some negative things about them, you know.  You know.

24          Q    Okay.  But then, I take it, from not having any specific conversations, you're  
25      not aware of any connection between Mr. Bowman and the Proud Boys?

1                   A    Not that I'm aware of, but then, again, you got to remember, like, I'm vocal.  
2   Look at my Facebook page. Okay? You guys have looked through it. All right? You  
3   know a lot about me, all right? And you were probably expecting me to be somewhat a  
4   noncompliant talking to you, probably. But when it came -- when it came to the Proud  
5   Boys, I honestly -- I didn't like them. They're not my kind of people. I don't like the  
6   drunken rowdiness and all that stuff. I don't like it, so --

7                   Q    Do you recall -- so I know -- tell me if I'm wrong about this, but it sounds like  
8   you and Mr. Bowman were, at least, some number of the same kind of political events  
9   and rallies and that's how you first got to know him, right?

10                  A    Yes.

11                  Q    And then I think you mentioned that Mr. Tarrio also showed up to a lot of  
12   these rallies because they were in Florida and so, just kind of as being people involved in  
13   these events and being in Florida, you came to meet him?

14                  A    Who?

15                  Q    That's Mr. Tarrio.

16                  A    Yeah. I mean, this guy would show up to events and he would shake  
17   everybody's hands and say hi to everybody. He was shaking my hand on several  
18   occasions and said hi to me.

1

2 [12:00 p.m.]

3

BY [REDACTED]

4 Q Do you recall any of those events where Mr. Bowman and Mr. Tarrio were  
5 both there?

6 A CPAC.

7 Q CPAC. Okay.

8 A But I believe that was after -- I believe that was after January, if I remember  
9 right, yeah.

10 Q Got it. And I know there were lots of these events, and a lot of them I'm  
11 sure kind of run together and --

12 A Yeah. And they don't -- I've never seen -- if your question is do I know of or  
13 if I've ever seen Charles Bowman have conversations with Entarrio, the leader of the  
14 Proud Boys, no, I've never seen that personally.

15 Q Okay.

16 A Now, have I seen him at the same events? Yeah, I mean, was at the same  
17 events with him, you know. When you have an event, all these people show up, and  
18 everyone's kind of there. I mean, it's not a -- it's not like a social. I mean, it's a flat  
19 wave, you know.

20 Q Okay. So you've never seen him talk before, but you are aware that  
21 they've been at the same events before?

22 A Of course, yeah.

23 [REDACTED] I think that's all that I have right now. Thanks, [REDACTED] And  
24 thanks, Mr. Liggett.

25 [REDACTED] Thank you, [REDACTED]

1 BY [REDACTED]

2 Q Just a quick followup on that, Mr. Liggett. You said you were disappointed  
3 a little in your role on January 6th. Could you explain why you were disappointed?

4 A Yeah. It was boring. First of all, they put me in a pink vest. Okay? And  
5 no offense, I know you're wearing a pink tie, all right, but I'm not the pink kind of guy.  
6 So I was in a bright orange and a bright pink vest. It was fricking cold as hell, okay, and  
7 they didn't feed us lunch. And it was boring, completely boring.

8 Q The speeches or the activity that you were doing?

9 A Oh, I don't know. I didn't get to see the speeches. I was too busy walking  
10 people here and there and passing out signs and stuff. So I was disappointed.

11 Q Was there something else that you were hoping to be doing as a marshal?

12 A I mean, it would've been nice to shake Trump's hand. Would've been nice  
13 to have lunch. I mean, do you see what I'm saying? Like, you know, it was really  
14 boring.

15 Q Understood. So I guess aside from your marshal activities, do you want to  
16 walk me through your January 6th day?

17 A Yeah, sure. No problem.

18 So I did the marshaling stuff, which was really boring. After that, there was so  
19 many people crowded up there, that I walked with Pastor Greg Locke back to his hotel. I  
20 dropped him off at his hotel, and then I was headed back to my hotel. And then I was  
21 told that antifa -- and this was word of mouth in the crowds. You've got to remember it  
22 was all crowded down there. I was told that antifa was causing trouble at the Capitol.  
23 And by this time I was very tired, because we got to the Ellipse, the event at like 4 or  
24 5 o'clock in the morning, and we didn't eat all day. They didn't provide us with any  
25 lunch or anything like that.

1           You guys should put that in your report, that it was cruel and unusual punishment  
2        by these rally people by not feeding us all day.

3           So anyway -- and you know they had the budget, because they ask for your money  
4        all the time, right. But, anyway, the point is, is I walked Pastor back. And, you know,  
5        once I got done walking Pastor back, they told me that antifa was attempting to start  
6        issues at the Capitol, right. So it was me and maybe five other people, maybe six  
7        people, I kind of don't recall, we walked over to the -- we walked over to the Capitol.

8           And it was interesting when I got there, because on the way there, I didn't know  
9        where I was going, right. And so -- you know, because I'm not really familiar with D.C.  
10       And so I was kind of lost, honestly. And I stopped by and asked some cops. I was like,  
11       Hey, which way's the Capitol? And they're like, Oh, it's that way. You guys have a safe  
12       evening. I said okay, and went on and got there.

13        And, you know, I had -- I remember I had a flag on me, and I waved the flag. I  
14       was there. I didn't see any what I would call people dressed like antifa, so that was kind  
15       of confusing because it was like, well, you know, what's going on? And then there was  
16       large groups of people on the steps. I'm just going to call it the front maybe. I don't  
17       know. Where were they building the metal structure?

18       Q      The inaugural stage was the west side.

19       A      Yeah. So that was really packed, dangerously packed. As matter of fact, I  
20       remember looking up on that -- I looked up, you know, from kind of afar. I looked up,  
21       and I seen them on that metal thing, and I thought to myself, that's not very safe, because  
22       people were sitting on it, and it wasn't a very strong structure, right. And I thought to  
23       myself, that could collapse, and that would hurt a lot of people. That doesn't make  
24       sense, and -- there was nothing you could do about it. I mean, you know, there was so  
25       many people there, you -- I mean, it wasn't like you could walk up and be, like, hey, get

1 off that, you know.

2 So, anyway, there was so many people there. I walked around -- I walked all the  
3 way around the building, on the outside of the building. And there was a CNN reporter  
4 there. I talked to the CNN -- or the CNN reporter tried to interview me. And I believe  
5 CNN puts out fake news footage, so I told CNN essentially that you're fake news. I don't  
6 even know why you're here. You shouldn't be here anyway.

7 And then we stood there for maybe 10, 15 more minutes, and then we went back  
8 and had pizza.

9 Q All right. So just a couple of followup. Do you know about what time you  
10 started walking to the Capitol?

11 A I don't recall. I think it was like way after the fact. When I say after the  
12 fact, like, I didn't see all the stuff that you see on the news. Like, I didn't see people,  
13 like, hitting cops and stuff like that. Well, you know what? Let me go back -- well, no, I  
14 didn't. I didn't. I did see the cops when I was on the other side, not the really packed  
15 side, but the other side -- I don't know what side it was.

16 Q Probably the east side.

17 A But I did hear the cops get on their loud speaker. There were people that  
18 were congregating up by the doors up there, and I heard them get on the loud speakers  
19 and tell people to leave. And then I seen the cops come -- now, remember, I was kind of  
20 far away, so don't ask me no crazy questions like who was there because I have no clue.  
21 I don't. You know, I was far away on the lawn, you know.

22 Q But it was still light out when you got to the Capitol?

23 A Yeah. Yeah, I would say it was right before it started getting dark or  
24 something.

25 Q And this is just to try to figure out the time so I can ask appropriate

1       questions of you that you might --

2           A    Yeah, it was still light out.

3           Q    Okay. So when you got back to your hotel with Pastor Locke, was that after  
4 President Trump's speech had finished?

5           A    Before.

6           Q    It was before his speech had finished. So his speech finished at 1:10 p.m.

7       About how long would you say --

8           A    Forever.

9           Q    -- in between you and walking?

10          A    Forever. It took us forever. It took us forever. I couldn't even tell you  
11 the time. It took us a long time to get back to the hotel there with him.

12          Q    Okay.

13          A    The place was so crowded. I mean, it took forever.

14          Q    How long after that did you leave your hotel and head to the Capitol with  
15 people?

16          A    Probably -- I couldn't tell you. Honestly, I couldn't tell you. I don't  
17 remember. I think it was a long time. I mean, we're talking hours.

18          Q    Yeah.

19          A    It wasn't minutes. It was hours. The place was so crowded, It took  
20 forever to walk somewhere. I mean, you weren't, you know --

21          Q    And when you say -- I'm just trying to figure out how far you were. You  
22 could see the inaugural stage, but you weren't underneath it, right? It was in the  
23 distance, from what you said?

24          A    It was in the distance, yeah.

25          Q    And then you walked around. Did you walk like left around the building?

1           A    Yeah.

2           Q    Okay. And did you come on to like any stones, or were you just walking the  
3    street, sort of around it?

4           A    No, I didn't walk on any stones.

5           Q    Stones' a bad word. You know, like the marble -- big marble paver, those  
6    that are in front of it?

7           A    I remember a statue.

8           Q    The Peace Monument probably as you're walking around --

9           A    Yeah.

10          Q    That's all right. I was wondering what -- I was just trying to get a sense of  
11    did you hear anything? Like, what were you hearing when you were walking around?

12          A    Someone -- what do I say? Someone -- I heard someone scream that they  
13    shot a protestor.

14          Q    Okay. Did you hear anything about hang Mike Pence or Mike Pence being a  
15    traitor?

16          A    No, but I've said Mike Pence is a traitor.

17          Q    You have?

18          A    Of course.

19          Q    Did you say it on January 6th?

20          A    No.

21          Q    Okay. Did you see President Trump's tweet on January 6th at 2:24 p.m.  
22    that said Mike Pence didn't have the courage to do what was necessary?

23          A    No. And the reason why I -- so we couldn't get anything on our phones.

24          Q    Okay. So you weren't communicating with anybody on Telegram, on

25          Signal --

1           A    No.

2           Q    -- on Parler?

3           A    Not that I can recall. I couldn't get any service on my phone at all when I  
4    was anywhere near the Capitol area.

5           Q    Okay.

6           A    I assumed -- I assumed the cops probably put some kind of internet blocker  
7    or some kind of blocker up.

8           Q    Did you use Zello that day?

9           A    Did I use what that day?

10          Q    Zello. It's a walkie-talkie app.

11          A    Not that I recall. I know people were using it.

12          Q    Did anyone ask you to take part in any of these other channels that day?

13          A    Not that I recall, no.

14          Q    Have you used -- were you using Zello at all during that period,

15          November 2020 to --

16          A    I don't know. I don't -- no, not that I recall. I've used -- I believe I've used  
17    it in the past a long time ago. Zello's stupid. I don't even know why they have the  
18    freaking app. It's a dumb app.

19          Q    All right. And with your group -- well, the group of guys you were with,  
20    were those other marshals or members of Guardians of Freedom?

21          A    It was a mix of people. There wasn't any specific, you know -- it  
22    wasn't -- me walking back with Greg Locke wasn't planned. None of that was planned.

23          Q    All right.

24          A    So whoever was standing around me at the time walked with me.

25          Q    And then just, can you explain why you didn't go closer to the Capitol?

1           A    Yeah. I mean, it was too doggone crowded. It was too crowded. Like,  
2 when we got there, there was no way you were getting up the -- over where that metal  
3 structure was, you weren't getting up those -- and even if you did, you'd get trampled to  
4 death. And, quite frankly, like, when we left, we heard flash bangs in the back -- you  
5 know, we could hear flash bangs going off. And that's when it kind of set in, you know,  
6 really what was happening, if that makes sense.

7           Q    Sure. What, in your mind, was happening when you heard flash bangs, you  
8 hear police telling people to leave?

9           A    Oh, at that point, that's when it was kind of like, ah, you know, like, you  
10 know, this is not a good thing that's happening. Right?

11          Q    Yeah. Did you -- before, you know, you heard those things, was your  
12 intention to go like up to the Capitol or wherever the people were?

13          A    When I heard that antifa -- because, remember, I heard antifa was causing  
14 issues at the Capitol, is what I was told. So my intentions were to go up to the Capitol to  
15 confront antifa, if antifa was attacking conservatives. That was my honest intentions.

16          Q    All right. And did you know why people were at the Capitol at that time?

17          A    When I was walking Greg Locke back to the hotel, I could hear people in the  
18 crowd saying that there was going to be a speaker at the Capitol. I'm not sure who it  
19 was. I would assume it was someone important because everybody was talking about  
20 it.

21          Q    And what did you -- did you hear "stop the steal"?

22          A    Like, what do you mean by that? Were people chanting it?

23          Q    Yeah, exactly.

24          A    I don't recall people chanting "stop the steal." You have to remember that  
25 I didn't go -- I was taking Greg Locke back to his hotel, and the police had us go a different

1 way. So what we wanted to do is we wanted to get out of that crowd of people and,  
2 you know, go to the hotel with the path of least resistance, I guess, is the best way to say  
3 it.

4 So, you know, where we were walking, I didn't hear that. Matter of fact, they  
5 walked us through -- is it BLM Plaza that's down there? And I thought that was  
6 completely ridiculous. They literally walked us through BLM Plaza, and I was expecting  
7 to get attacked and beat up in BLM Plaza, and that didn't happen. No one was there.

8 Q Well, in terms of "stop the steal," so you mentioned that you have said Mike  
9 Pence is a traitor. Were you hoping on January 6th that the certification for Joe Biden  
10 wouldn't go through and that President Trump would continue to be President?

11 A No. What I was hoping is, is I was hoping that, you know, President -- I was  
12 hoping that President Trump would've been elected when we did the election. You  
13 know, I didn't really dive into politics until after all this happened.

14 So do you want my story?

15 Q Well, you know, if you want to tell it, feel free. But I was more asking just  
16 like, you know, you said you think Mike Pence is a traitor, the January 6th rally was  
17 President Trump talking about election fraud issues. So the most direct question I can  
18 ask right now and we can move on is, did you think the November 2020 election was  
19 stolen from President Trump?

20 A Yeah. I mean, I think it was. I think that there was election fraud 100  
21 percent.

22 Q Okay. And why do you think that?

23 A I mean, it's a fact. The proof is there.

24 Q Where are you getting the information about the proof?

25 A I mean, it's everywhere. It's absolutely everywhere. I don't have one

1        person coming up to me and saying, hey -- but, you know, that's just my opinion, you  
2        know.

3            Q    Great. Well, you just called it a fact. So is it your opinion or is it a fact?

4            A    Well, my opinion is it's a fact, but you might not see it as a fact. I see it as a  
5        fact, but it's an opinion I'm saying. Right?

6            Q    All right. But facts are facts versus opinions. So, in your opinion, the  
7        election was stolen?

8            A    Well, I'll agree to disagree with you on that one because, you know -- any of  
9        us can look at something and interpret it different.

10          Q    Agreed. But that'd be an interpretation.

11          Q    All right. Well, anyway, this is existential --

12          A    Well, it would be a fact, if you thought it was a fact, even if it was an  
13        interpretation, right?

14          Q    So you're getting information on social media platforms or through news  
15        organizations about the election?

16          A    Yeah. I mean, so -- yeah. And, look, the stuff that the liberal left is doing  
17        is shady stuff, very shady stuff.

18          Q    And that informed your view about the 2020 election?

19          A    What's that? No. No, this was after the fact, buddy.

20          Q    Okay.

21          A    This has nothing to do with January.

22          Q    Got it. And so why do you think Mike Pence is a traitor then?

23          A    Well, I mean, look, the guy did not, in my opinion, uphold the Constitution  
24        the whole time he -- and my opinion on Pence started a long time ago. It had nothing to  
25        do with the election in general. I don't think he's a -- I don't think he's -- I don't think

1 he's a constitutional person at all whatsoever. I think he's a Republican in name only,  
2 and I think that the stuff that he does is just so he can better himself and his career and  
3 stuff like that in politics. I don't think that it has anything to do with him caring about  
4 the American people whatsoever, just like I don't think Joe Biden cares about the  
5 American people. That doesn't mean I hate him, right?

6 Q So your views about Mike Pence being a traitor are not tied to him certifying  
7 the vote on January 6th for Joe Biden?

8 A No, not at all. He was a traitor before that, in my opinion.

9 Q On January 6th, did you hear people around you talking about the  
10 certification of the vote for Joe Biden?

11 A Not that I recall.

12 Q So did anyone mention going to the Capitol because Congress was about to  
13 start voting?

14 A No. The word -- the talk was that there was going to be a speaker at the  
15 Capitol. And like I said, I don't remember who -- you'd probably know who was  
16 speaking. I don't remember who was speaking.

17 Q Well, that's fine.

18 I only have a few more questions for you.

19 Do you know a Jason Biggs?

20 A No.

21 Q He's a member of the Proud Boys.

22 A Jason Biggs?

23 Q Yeah -- I'm sorry. Joe Biggs.

24 A I've heard of Joe Biggs, yeah.

25 Q Yeah, that was my bad. J names I should know that with us all being J

1       names.

2           Have you ever met Joe Biggs?

3           A    No.

4           Q    Okay. And for the record, are you a member of the Proud Boys?

5           A    Hell no. No.

6           Q    Are you a member of the Oath Keepers?

7           A    No.

8           Q    And would you consider yourself a member of any militia groups?

9           A    No.

10          Q    Okay.

11          A    None whatsoever.

12          Q    And were you aware of any communications -- sorry. Were you a part of  
13       any communications with them, any of those groups on January 6th?

14          A    No.

15          Q    Okay. And just -- I'll represent to you that Joe Biggs posted to Facebook in  
16       late December about making an alliance between Proud Boys, Oath Keepers, a Florida  
17       Three Percenter group.

18          A    When did he do this?

19          Q    I'll just show you the post. It's probably the easiest way to do it.

20          A    Yeah, I want to see that.

21          Q    It's not the exact post. It is a -- can you see that?

22          A    Is this the reason why that the FBI keeps following me around every day on  
23       where I go?

24          Q    I don't know.

25          A    Okay.

1           Q    I shared the wrong screen with you. I apologize.

2           Nope, it's still not working. One second. Let me figure out what the heck's  
3    happening here.

4           Okay. Sorry. I am also technologically not savvy.

5           There we go.

6           So this is just the typed -- it's not the actual Facebook post. I'll zoom in -- sorry.

7           I meant Kelly Meggs the whole time too, not Jason -- not Joe Biggs. So I'm having quite  
8    a day with names.

9           So Kelly Meggs is also --

10          A    Who's Kelly Meggs?

11          Q    He is an Oath Keeper from Florida. And so he says: Well, we are ready  
12    for the rioters. This week I organized an alliance between Oath Keepers, Florida Three  
13    Percenters, and Proud Boys. We have decided to work together and shut this shit down.

14          He posted it on December 19th, after President Trump's "will be wild" tweet.

15          Do you have --

16          A    I don't know.

17          Q    Do you know who this Florida Three Percenter group would be?

18          A    No. No. I can 100 percent, without a doubt, tell you that that is not in  
19    reference to anything that we were doing before or -- well, I can't say anything after, but  
20    before January 6th, there's no way, no way.

21          Q    Do you have any guess or hint about which Three Percenter group in Florida  
22    Mr. Meggs was talking about?

23          A    I mean, my guess would be -- if I were an investigator and I was investigating  
24    this, I would probably look into the Three Percenter-Originals. That's probably who I  
25    would look at.

1           Q    Right. But you were aware that -- or were you aware of any  
2   Three Percenter groups in Florida at the time who had ties to the Oath Keepers?

3           A    No.

4           Q    Okay. And no one in your group mentioned any ties to the Oath Keepers?

5           A    No.

6           Q    Okay. Thank you.

7           And I'm just going to share actually -- I don't know why I stopped -- a couple of  
8   other posts.

9           Did you see this social media post before January 6th?

10          A    No. But please tell me that my group did not put that out.

11          Q    They did not --

12          A    Okay.

13          Q    -- as far as I know.

14          A    Good.

15          Q    Unless you saw it in your Telegram chat or Facebook.

16          A    No, no, no. Did not. No. No. No.

17          Q    Then I guess the last real question, do you want to -- I know you did a  
18   Facebook post video responding to some people on Twitter. But just looking back on  
19   January 6th, like, what is the day -- like, what happened that day, what does it mean to  
20   you?

21          A    What did it mean to me?

22          Q    Like, what does it mean to you in terms of American politics or American  
23   history or just -- it's a very broad question, I know.

24          A    Well, do you want me to be open with you about the whole thing?

25          Q    Yes.

1           A    And this is just coming from my perspective.   Okay?

2           Q    Sure.

3           A    And so here's how I believe, just from my perspective and what I've seen.

4    Okay?   From my perspective, there was no collusion.   There was no conspiracy, okay,  
5    to attack the Capitol, from my perspective.   Okay?   I don't have the same information  
6    you guys have.

7           A lot of this stuff that you showed me today, I -- you know, it's kind of crazy, but  
8    we'll set that to the side, okay.   I don't -- you know, I don't believe that there was any,  
9    you know, like planned thing, just from my perspective.   And I believe that people that  
10   were there did some things they shouldn't have done.

11           So I believe that we should have the First Amendment right.   I believe that we  
12    should be able to protest at the Capitol.   Okay?   I don't believe that you should hit law  
13    enforcement officers.   Okay?   I don't believe that you should, you know, go into the  
14    building unless you're invited.   From some of the stuff that I've seen that's fact, people  
15    were invited in.   Okay?   So let's put that on the Capitol Police.   Right?

16           I think that the Capitol Police could have done a better job securing the building  
17    beforehand.   I believe that the individuals that struck law enforcement officers or went  
18    in the Capitol inside should be charged, you know, for what they did.   Okay?

19           But with saying that, okay, I believe that this administration, the Joe Biden  
20    administration, has weaponized the Department of Justice, okay, to include the CIA.  
21    Right?   And I believe that you guys are -- you guys, them, are swinging a big bat at little  
22    bitty flies.

23           And it disheartens me, okay, that I am a citizen of a country right now, okay, that  
24    is locking people up on misdemeanor charges and keeping them in jail with no bonds,  
25    okay, for now months and possibly years.   Okay?

1           If you guys are going to charge these people with a crime, they shouldn't be  
2           treated any differently than anyone else that we would charge. If you were to charge,  
3           i.e., example, your neighbor for criminally trespassing on your property, okay, your  
4           neighbor would be allowed a bond and your neighbor could bond out of jail and then, you  
5           know, have their day in court. That is not what this administration's doing.

6           If there were people that were -- that had gotten together beforehand, okay, and,  
7           you know, had a specific plan to attack the Capitol, then those people should be dealt  
8           with accordingly. Okay?

9           But this is not a black-and-white situation. All right? And I think that the  
10          administration handled it completely wrong. I really do.

11          I'll give you a good example. Okay? My organization at the time -- I say my  
12          organization because, obviously, I helped found it, right? Okay. We didn't do anything  
13          violent whatsoever in Washington, D.C., at all. Okay? If you look at the stuff that  
14          they've put out about me and things like that, the majority of it's not true; i.e., example,  
15          militia, we weren't a militia. Okay? We weren't. It wasn't like that, you know. We  
16          didn't, you know, get with these other organizations to do this.

17          And, you know -- now, look, if the Department of Justice wants to come to my  
18          house and knock on the door and say, Jeremy, you're a bad boy because, you know, you  
19          went to D.C. and you said that if antifa attacked people, that you would defend people  
20          against antifa, then so be it. Right? That's the truth.

21          Q       Well, I appreciate the answer, Mr. Liggett.

22          So I guess just to follow up, I'll represent to you that a lot of people who did the  
23          bad things that you were talking about, hitting law enforcement, going into the Capitol,  
24          chanted 1776 and made other references to the Revolutionary War, called it a revolution.  
25          You, yourself -- I saw your tattoo. It says 1776 and We the People.

1                   A    It does. It does.

2                   Q    And so would you associate what those people did with what your views of  
3    1776 was about?

4                   A    No. It's completely different, completely different. Okay? You know, I'll  
5    give you an example what I'm talking about. Right now Russia's an issue, right?  
6    Russia's a big issue. Okay? And this is what you should take away with a lot of the  
7    Three Percent organizations. I don't know anything about the other organizations.  
8    Okay? But like our organization, yeah, we use that term, that T-shirt term, that hat term  
9    "Three Percent" at one time. Right? Like I said, I tried to change it, but it's besides the  
10   point.

11                  But it's like this. You know, we're having issues with Russia right now. Okay?  
12                  If Russia parachuted into this country for some reason, okay -- think about this. If Russia  
13    attacked America, parachuted America for some reason, wouldn't you want patriots to  
14    step up and fight Russia out of this country?

15                  Q    Well, don't we have the military for that?

16                  A    Yeah, a very small military. But let me ask you a question. Okay? When  
17    the Russian soldiers come to your door and that military unit's nowhere around, are you  
18    just going to give your family up? You see what I'm saying?

19                  Like -- so bottom line, at the end of the day, this is -- you know, this is not  
20    about -- this is not about we hate America. That's not what this about. My tattoo  
21    1776 has nothing to do with hate at all. My We the People has nothing to do with hate  
22    at all. Right? And it has nothing to do with militia at all.

23                  Q    I appreciate that.

24                  A    The Founders of our country -- the Founders of our country believed in this  
25    patriotism.

1 All right. Well, I appreciate your answer, Mr. Liggett, and I don't  
2 have any further questions.

3 I'll take a second to see -- I don't think anyone -- [REDACTED] hasn't come on, so I  
4 don't think he has any questions.

5 So, at this time, we will close the deposition and go off the record.

6 [Whereupon, at 12:31 p.m., the deposition was adjourned.]

7

2

3

4

4 I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the  
5 answers made by me to the questions therein recorded.

6

7

8

9

10 Witness Name

11

12

13

14

15

Witness Name

Date